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Transcript of Mark Mahon, Ph.D.

Date: March 13, 2025

Case: Aylo Freesites Ltd. -v- WellcomeMat, LLC (PTAB)

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

Aylo Exhibit 1024
Aylo v. WellcomeMat, IPR2024-00710

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

3
4 AYLO FREESITES LTD,

5 Petitioner

6 V.

7 WELLCOMEMAT, LLC,

8 Patent Owner

9
10 IPR2024-00710

11 U.S. Patent No. 8,307,286

12
13 Remote Videotaped Deposition of DR. MARK MAHON

14 Thursday, March 13, 2025

15 10:00 A.M.

16
17
18
19 Job No.: 574790

20 Pages: 1 - 191

21 Reported By: Anita M. Trombetta, RMR, CRR,

22 California CSR No. 14647

1
2
3
4 Videotaped deposition of DR. MARK MAHON,
5 conducted remotely, pursuant to notice, before
6 Anita M. Trombetta, a Certified Shorthand Reporter
7 in the State of California, RMR, CRR, and Notary
8 Public in and for the State of New York.
9
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A P P E A R A N C E S

ON BEHALF OF THE PETITIONER:

STEPHEN YAM, ESQUIRE

JONATHAN M. SHARRET, ESQUIRE

IAN G. PAQUETTE, ESQUIRE

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ON BEHALF OF THE PATENT OWNER:

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ALSO PRESENT:

MIKE MARTINEZ, REMOTE TECHICIAN

WILLIAM PANTOJA, VIDEOGRAPHER

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-----I N D E X-----

WITNESS

DR. MARK MAHON

EXAMINATION BY

PAGE

ATTORNEY YAM

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ATTORNEY SCHREINER

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-----E X H I B I T S-----

EXHIBIT

DESCRIPTION

PAGE

Exhibit 1001

'286 Patent

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Exhibit 2015

Declaration of Dr.
Mark Mahon

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Exhibit 2014

CV of Dr. Mark
Mahon

23

Exhibit 1004

U.S. Patent
Publication Number
2005-0081159

145

Exhibit 1005

U.S. Patent
Publication
2005-0144305

161

Exhibit 1008

Vasilevsky
Reference

173

P R O C E E D I N G S

1		
2	THE VIDEOGRAPHER: Here begins media	09:59:43
3	number 1 in the videotaped deposition of Dr. Mark	09:59:52
4	Mahon, in the matter of Aylo Freesites Ltd vs.	09:59:55
5	WellcomeMat LLC, in the United States Patent and	09:59:59
6	Trademark Office, before the Patent Trial and	10:00:04
7	Appeal Board, Case Number IPR 2024-007101.	10:00:08
8	Today's date is March 13th, 2025. The	10:00:15
9	time on the video monitor is 10:00 A.M.	10:00:19
10	The remote videographer today is William	10:00:22
11	Pantoja, representing Planet Depos.	10:00:26
12	All parties of this video deposition are	10:00:27
13	attending remotely.	10:00:29
14	Would counsel please voice-identify	10:00:30
15	themselves and state whom they represent.	10:00:32
16	ATTORNEY YAM: Stephen Yam, of Venable	10:00:34
17	LLP, representing petitioner Aylo Freesites.	10:00:37
18	With me are Ian Paquette and Jonathan	10:00:40
19	Sharret, also of Venable LLP.	10:00:44
20	ATTORNEY SCHREINER: Stephen Schreiner,	10:00:46
21	from Carmichael IP, PLLC, on behalf of patent	10:00:47
22	owner Multimedia Technologies.	10:00:52

Transcript of Mark Mahon, Ph.D.
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1	ATTORNEY YAM: Counsel, is that the right	10:00:59
2	patent owner?	10:01:01
3	ATTORNEY SCHREINER: Oh, I'm sorry. Thank	10:01:02
4	you, Stephen.	10:01:04
5	On behalf of WellcomeMat LLC, patent	10:01:06
6	owner.	10:01:10
7	THE VIDEOGRAPHER: The court reporter	10:01:13
8	today is Anita Trombetta, representing Planet	10:01:14
9	Depos as well.	10:01:17
10	The witness will now be sworn.	10:01:17
11	D R. M A R K M A H O N, called as a witness,	10:01:18
12	having been first duly sworn by a Notary Public,	10:01:18
13	was examined and testified as follows:	10:01:18
14	EXAMINATION BY	10:01:18
15	ATTORNEY YAM:	10:01:31
16	Q Good morning, Dr. Mahon.	10:01:31
17	A Good morning.	10:01:35
18	Q Did I pronounce your last name correctly?	10:01:35
19	A Yes, you did.	10:01:38
20	Q Great. Thank you.	10:01:39
21	How are you today?	10:01:41
22	A I'm doing well. How are you?	10:01:43

1	Q Good, good.	10:01:45
2	So, initial questions.	10:01:48
3	Have you been deposed before?	10:01:50
4	A Yes, I have.	10:01:52
5	Q Around how many times?	10:01:54
6	A I'm going to guess somewhere around 15	10:01:56
7	times.	10:02:00
8	Q In those 15 instances where you've been	10:02:03
9	deposed, about a span of how many years does that	10:02:05
10	encompass?	10:02:08
11	A Ten years.	10:02:09
12	Q Were those all patent cases?	10:02:14
13	A Yes, I believe so.	10:02:18
14	Q And you were deposed as a technical expert	10:02:20
15	in all those cases?	10:02:24
16	A That is correct.	10:02:27
17	Q Do you understand that you are testifying	10:02:27
18	under oath today?	10:02:31
19	A Yes, I do.	10:02:34
20	Q And do you understand what it means to	10:02:35
21	testify under oath?	10:02:37
22	A Yes, I do.	10:02:39

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1	Q Is there any reason that you are unable to	10:02:40
2	provide truthful and accurate answers today?	10:02:43
3	A No, there is not.	10:02:46
4	Q Great.	10:02:48
5	Are you taking any medication that may	10:02:50
6	influence your ability to answer your questions	10:02:52
7	truthfully and accurately?	10:02:55
8	A No, I am not.	10:02:56
9	Q Great.	10:02:57
10	So you've been through this several times	10:02:59
11	before, but I'll just establish the ground rules	10:03:01
12	just for the record.	10:03:05
13	I will be asking you questions throughout	10:03:05
14	the course of the day. In doing so, I will try to	10:03:08
15	be clear in my questioning.	10:03:10
16	If for some reason a question is not clear	10:03:11
17	to you, please feel free to let me know, and I'll	10:03:13
18	try to rephrase it or otherwise clarify the	10:03:16
19	question.	10:03:18
20	Sound good?	10:03:19
21	A Yes, it does.	10:03:20
22	Q Great.	10:03:21

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1	If you do not inform me that a question is	10:03:23
2	unclear, I will assume that you understand the	10:03:24
3	question. Okay?	10:03:26
4	A Yes.	10:03:29
5	Q Great.	10:03:30
6	Also, because the reporter will need to	10:03:31
7	clearly hear us speak to make an accurate record,	10:03:34
8	and as we are conducting this remotely, please try	10:03:37
9	to let me finish asking a question before you	10:03:40
10	begin to respond, and I will also do the same when	10:03:42
11	you are talking.	10:03:45
12	Sound good?	10:03:46
13	A Yes.	10:03:47
14	Q Great.	10:03:48
15	During the course of this deposition, your	10:03:50
16	counsel may make objections. It will generally be	10:03:51
17	the word "objection," followed by a word	10:03:55
18	indicating the basis for the objection.	10:03:58
19	So unless the objection is based on	10:04:00
20	privilege, you are still required to respond to	10:04:03
21	the question.	10:04:05
22	Do you understand that?	10:04:06

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1	A Yes, I do.	10:04:07
2	Q Great.	10:04:08
3	I will also try to take a break about	10:04:10
4	every hour or so during the deposition today. If	10:04:13
5	you feel like you need a break before that, please	10:04:16
6	feel free to just let me know. All I ask is that	10:04:18
7	if there is a question pending that you respond to	10:04:20
8	the question before we go on break.	10:04:22
9	Sound good?	10:04:24
10	A Yes, it does.	10:04:25
11	Q Great.	10:04:26
12	And, again, to note for the record, we are	10:04:28
13	conducting today's deposition by remote	10:04:30
14	videoconference via Zoom.	10:04:33
15	Is there anyone else in the room with you	10:04:36
16	today?	10:04:38
17	A No, there is no one else in the room, no.	10:04:38
18	Q Okay. Where are you currently?	10:04:41
19	A I'm at my daughter's house in Milwaukee.	10:04:43
20	Q And where is your -- where do you live?	10:04:47
21	A State -- Port Matilda, PA, which is right	10:04:56
22	near State College, Pennsylvania.	10:05:01

1	Q Do you have any physical documents in	10:05:08
2	front of you today?	10:05:10
3	A I do not.	10:05:11
4	Q Do you have any electronic documents open	10:05:11
5	in front of you?	10:05:13
6	A I do not have any open.	10:05:14
7	Q Okay. Do you currently have your cell	10:05:16
8	phone accessible?	10:05:19
9	A It is on my table.	10:05:20
10	Q Okay. Since we're conducting this	10:05:22
11	remotely and I'm not able to see it in person, all	10:05:26
12	I ask is that you refrain from checking or viewing	10:05:31
13	or accessing your cell phone during the course of	10:05:33
14	the deposition.	10:05:35
15	If you want to check your personal email	10:05:35
16	during breaks or make a quick personal call during	10:05:38
17	breaks, that's fine.	10:05:40
18	Sound good?	10:05:42
19	A Understood.	10:05:43
20	Q Thank you.	10:05:44
21	We'll be referring to today's various	10:05:44
22	exhibits today in electronic form. I ask, again,	10:05:46

1 that during today's deposition, you refrain from 10:05:50
2 accessing any physical or electronic sources of 10:05:52
3 information that pertain to this proceeding other 10:05:55
4 than those that are provided during the 10:05:58
5 deposition. 10:06:00

6 Sound good? 10:06:00

7 A Yes. 10:06:02

8 Q Okay. Our discussion today will involve 10:06:03
9 U.S. Patent Number 8,307,286, which is the subject 10:06:09
10 patent for this proceeding. 10:06:14

11 For shorthand today, I'll just refer to 10:06:17
12 U.S. patent number 8,307,286 as "the '286 patent." 10:06:20

13 Sound good? 10:06:27

14 A Yes, it does. 10:06:28

15 Q Great. 10:06:29

16 And during the course of the day, I will 10:06:30
17 generally be asking questions from the perspective 10:06:32
18 of a person of ordinary skill in the art at the 10:06:34
19 time of the alleged priority date of the '286 10:06:38
20 patent. 10:06:42

21 I believe you have opined that that such 10:06:43
22 date is around 2006; is that correct? 10:06:46

1	A That is correct.	10:06:49
2	Q Okay. And if I use the term "POSA" or	10:06:50
3	"POSITA" today, I will be referring to a person of	10:06:54
4	ordinary skill in the art.	10:06:59
5	Will you understand what I mean when I	10:07:00
6	refer to "POSA" or "POSITA" today?	10:07:02
7	A Yes, I -- I will.	10:07:06
8	Q Great.	10:07:06
9	Also, unless my question indicates	10:07:08
10	otherwise, please understand that I will be asking	10:07:13
11	that question from the perspective of a POSA or	10:07:16
12	POSITA.	10:07:20
13	Does that sound good?	10:07:20
14	A Yes, it does.	10:07:22
15	Q Great.	10:07:23
16	So I'd like to turn to the -- how you	10:07:27
17	prepared your -- your declaration.	10:07:33
18	So just to start, when were you retained	10:07:36
19	to work on this proceeding, this IPR?	10:07:39
20	A I believe that was in October of last	10:07:43
21	year.	10:07:45
22	Q October 2024?	10:07:46

1	A	Correct.	10:07:48
2	Q	And who reached out to you to initiate	10:07:49
3		your involvement in this proceeding?	10:07:58
4	A	Originally, I was contacted by a company	10:08:00
5		called Keystone Strategy.	10:08:03
6	Q	What is Keystone Strategy?	10:08:07
7	A	Well, my understanding is, they're a -- a	10:08:13
8		group of engineers that work on issues such as	10:08:15
9		patent litigation.	10:08:21
10	Q	Are you aware of the business model of	10:08:22
11		Keystone Strategy?	10:08:36
12	A	I'm not really, no.	10:08:37
13	Q	Have you worked with Keystone Strategy	10:08:40
14		prior to this proceeding?	10:08:42
15	A	No, I have not.	10:08:43
16	Q	Do you know if Keystone Strategy is a	10:08:46
17		patent expert search firm?	10:08:48
18	A	I wouldn't be able to tell you one way or	10:08:50
19		the other. I don't know what the technical	10:08:55
20		definition of a search firm is and how they may	10:08:58
21		differ from a search firm.	10:09:01
22	Q	Have you worked with patent -- have you	10:09:04

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1	worked with expert search firms before?	10:09:09
2	A I believe two or times, yes.	10:09:11
3	Q Did Keystone Strategy reach out to you in	10:09:14
4	generally the same manner as those other search	10:09:20
5	firms?	10:09:22
6	A Via email, yes.	10:09:23
7	Q When did you start substantive working --	10:09:26
8	your substantive work on this proceeding?	10:09:42
9	A My recollection is, in November of last	10:09:45
10	year.	10:09:48
11	Q Have you been working continuously since	10:09:48
12	November on this proceeding?	10:09:55
13	A Yes.	10:09:57
14	Q Around how much time have you spent	10:09:58
15	working on this proceeding?	10:10:08
16	A Somewhere in the order of 25 hours would	10:10:13
17	be my approximation.	10:10:16
18	Q And those 25 hours are spread going back	10:10:17
19	to November 2024?	10:10:27
20	A Yes.	10:10:29
21	Q Are they about evenly spread?	10:10:30
22	A No. I put a lot of -- most of my work was	10:10:35

1	in the November/December time frame, and then I	10:10:39
2	put additional work in, in January and February.	10:10:42
3	And, obviously, I put in work this month.	10:10:44
4	Q What is your current hourly rate?	10:10:47
5	A \$550 an hour.	10:10:57
6	Q Is that the rate that you are charging for	10:11:03
7	your work in this proceeding?	10:11:08
8	A Yes.	10:11:10
9	Q About how much have you been paid to date	10:11:17
10	for your work in this matter?	10:11:20
11	A I received compensation for November and	10:11:21
12	December. So that's somewhere around 12- to	10:11:26
13	15,000, I believe.	10:11:29
14	Q And who did you receive compensation from?	10:11:30
15	A I received from Keystone Strategy.	10:11:39
16	Q Are you aware of whether anyone at	10:11:49
17	Keystone Strategy is a -- is an attorney?	10:12:05
18	A I am not.	10:12:07
19	Q Who have you spoken with from Keystone	10:12:10
20	Strategy?	10:12:17
21	A I've interacted with three individuals.	10:12:18
22	The original -- and I would have to look up their	10:12:23

1	names.	10:12:26
2	The first one's first name was Max.	10:12:27
3	The other two names I'd have to look up.	10:12:29
4	I don't recall their names.	10:12:33
5	Q Have you been corresponding with Keystone	10:12:43
6	Strategy continuously since October 2024?	10:12:46
7	A On and off. I corresponded, obviously,	10:12:50
8	with them in the October, November, December time	10:12:55
9	frame, and then a few email exchanges back and	10:12:58
10	forth in the January, February and current time	10:13:01
11	frame.	10:13:05
12	Q Do you know how Keystone Strategy is	10:13:05
13	related to the patent owner, WellcomeMat LLC, in	10:13:15
14	this case?	10:13:23
15	A I am not.	10:13:24
16	Q Have you ever inquired as to how Keystone	10:13:25
17	Strategy is related to WellcomeMat LLC?	10:13:29
18	A I have not.	10:13:32
19	Q When was your first correspondence with	10:13:33
20	counsel for WellcomeMat LLC in this proceeding?	10:13:57
21	A I believe it was in October or -- it might	10:14:00
22	have been November. Somewhere in that time frame.	10:14:07

1	Q Just for a reference, the counsel is from	10:14:09
2	the Carmichael IP firm, I believe, correct?	10:14:15
3	A Yes. Mr. Schreiner.	10:14:20
4	Q Okay. Have you corresponded with anyone	10:14:22
5	else besides Mr. Schreiner from Carmichael?	10:14:23
6	A I don't recall anyone else.	10:14:29
7	Q Have you corresponded with any other	10:14:38
8	attorneys for this proceeding, this IPR?	10:14:41
9	A Not that I can recall.	10:14:48
10	Q Have you corresponded with anyone from the	10:14:52
11	law firm of Sussman Godfrey, with respect to this	10:14:54
12	proceeding?	10:14:57
13	A I have not.	10:14:57
14	Q Are you familiar with an individual named	10:15:10
15	Dr. Scott Shaffer?	10:15:12
16	A It does not ring a bell.	10:15:17
17	Q So, given your response, I assume that you	10:15:20
18	have not spoken with Dr. Scott Shaffer regarding	10:15:22
19	this proceeding?	10:15:26
20	A I have not.	10:15:27
21	Q Okay. Have you spoken with any other	10:15:28
22	experts regarding the '286 patent or this	10:15:32

1	proceeding?	10:15:38
2	A No, I have not.	10:15:41
3	Q How did you prepare for today's	10:15:45
4	deposition?	10:15:49
5	A I reviewed my declaration and the prior	10:15:49
6	art, and met with counsel.	10:15:54
7	Q Did you do anything else to prepare for	10:16:05
8	today's deposition?	10:16:07
9	A Just reviewed some documents associated	10:16:07
10	with my declaration. That's all I can recall.	10:16:18
11	Q Which prior art did you review in	10:16:26
12	preparing for today's deposition?	10:16:28
13	A The prior art cited in the petition and	10:16:32
14	any references that I may have utilized in my	10:16:36
15	declaration and/or were in the -- referenced by	10:16:41
16	the petition.	10:16:45
17	Q In preparing for today's deposition, did	10:16:56
18	you review any documents that are not cited in	10:16:58
19	your declaration?	10:17:00
20	A Not that I can recall.	10:17:01
21	Q When did you begin preparing for today's	10:17:08
22	deposition?	10:17:21

1	A This past weekend, I -- I started	10:17:22
2	preparing.	10:17:28
3	Q And you mentioned that you met with	10:17:30
4	counsel to prepare for today's deposition; is that	10:17:42
5	right?	10:17:44
6	A That is correct.	10:17:45
7	Q Which counsel, specifically?	10:17:46
8	A Mr. Schreiner, Stephen Schreiner.	10:17:48
9	Q Anyone else?	10:17:57
10	A No.	10:17:58
11	Q Did you meet with Mr. Schreiner in person	10:17:59
12	or virtually?	10:18:02
13	A Virtually.	10:18:03
14	Q How many times?	10:18:06
15	A We met yesterday.	10:18:11
16	Q Did you meet at any other time other than	10:18:15
17	yesterday?	10:18:17
18	A Not in preparation for the deposition, no.	10:18:19
19	Q About how long was your meeting yesterday	10:18:30
20	with Mr. Schreiner?	10:18:32
21	A We met around six and seven hours,	10:18:33
22	somewhere in there.	10:18:40

1	Q Have you ever met or spoken with anyone	10:18:57
2	previously or presently employed with patent	10:19:00
3	owner, WellcomeMat LLC?	10:19:03
4	A Not that I can recall.	10:19:05
5	Q Did you speak with any non counsel in	10:19:20
6	preparing for today's deposition?	10:19:30
7	A I did not.	10:19:32
8	Q You're aware that the law firm Carmichael	10:19:48
9	IP is representing WellcomeMat in this IPR?	10:19:50
10	A I am.	10:19:54
11	Q Have you worked with Carmichael IP prior	10:19:55
12	to this IPR?	10:20:00
13	A Yes, one other time.	10:20:01
14	Q Which case was that?	10:20:05
15	A That was a PanOptis case, several years	10:20:06
16	ago.	10:20:15
17	Q Do you have a ballpark year of when you	10:20:19
18	were involved?	10:20:21
19	A My guess would be 2020, somewhere in that	10:20:23
20	time frame.	10:20:27
21	Q Was that with Mr. Schreiner as well?	10:20:27
22	A No.	10:20:37

1	Q Do you recall who -- who that case	10:20:38
2	involved at Carmichael?	10:20:49
3	A I do not. I believe it was	10:20:53
4	Mr. Carmichael, but that doesn't sound right. So	10:20:55
5	I can't say specifically.	10:21:00
6	Q Okay. About how many hours did you spend	10:21:01
7	preparing for today's deposition?	10:21:07
8	A I spent about four or five hours reviewing	10:21:08
9	my declaration and looking at the other documents	10:21:12
10	that I mentioned.	10:21:16
11	Q And that's in addition to the about six to	10:21:18
12	seven hours that you spent yesterday with	10:21:22
13	Mr. Schreiner?	10:21:23
14	A That's correct.	10:21:24
15	Q So adding those two up, you spent around,	10:21:25
16	ballpark, 12 to -- well, 10 to 12 hours preparing	10:21:34
17	for today's deposition?	10:21:39
18	A Yeah, and I put in an hour. I did spend	10:21:42
19	an hour, I believe, on Sunday and -- but -- so	10:21:44
20	that sounds about right.	10:21:50
21	ATTORNEY YAM: So at this time, I'm going	10:22:11
22	to admit some exhibits, and I will upload them	10:22:13

1	into the chat.	10:22:16
2	Dr. Mahon, I believe you should have	10:22:18
3	access to the chat. You're now able to download	10:22:20
4	them into your local system for reviewing at your	10:22:24
5	end if you'd like.	10:22:26
6	I believe the technician also has the	10:22:28
7	ability to place them on the screen share, if	10:22:30
8	that's your preference, as well.	10:22:32
9	THE WITNESS: I'd rather have them	10:22:35
10	downloaded locally, please.	10:22:37
11	ATTORNEY YAM: I figured.	10:22:39
12	(Exhibit 1001, marked for identification.)	10:22:39
13	(Exhibit 2015,,marked for identification.)	10:22:39
14	(Exhibit 2014, marked for identification.)	10:22:56
15	Q Okay. So I've uploaded three documents	10:22:56
16	into the chat.	10:22:58
17	The first exhibit is stamped Exhibit 1001,	10:23:03
18	and it's U.S. Patent Number 8,307,286, the patent	10:23:06
19	at issue.	10:23:11
20	The second document is stamped	10:23:12
21	Exhibit 2015, and that's entitled, "Declaration of	10:23:14
22	Mark P. Mahon, Ph.D."	10:23:21

1 And the third final exhibit so far is
2 stamped Exhibit 2014, and that's the CV of
3 Dr. Mark Mahon.

4 Dr. Mahon, are you able to retrieve those
5 documents?

6 A Yes, I have.

7 Q Great.

8 Can you please open up Exhibit 2015,
9 please. Again, it's entitled, "Declaration of
10 Mark P. Mahon, Ph.D."

11 A Okay. I opened it.

12 Q Is this a declaration that you prepared in
13 connection with this IPR proceeding?

14 A Yes, it is.

15 Q If can you turn to the last page. I
16 believe it is stamped Page 208 of 208 at the
17 bottom right.

18 A Okay. I'm there.

19 Q Can you confirm that the final page of
20 Exhibit 2015 includes your signature on this page,
21 and that's your signature?

22 A It does contain my signature, and that is

1	my signature, yes.	10:24:58
2	Q Great. Thank you.	10:24:59
3	Does this declaration, Exhibit 2015,	10:25:01
4	represent a complete statement of your opinions	10:25:07
5	regarding the '286 patent?	10:25:10
6	A Yes, it encompasses my opinions with	10:25:12
7	respect to this patent.	10:25:20
8	Q Does it include all the facts and data	10:25:21
9	that you used to reach your conclusions regarding	10:25:24
10	the '286 patent?	10:25:27
11	A Yes, it does.	10:25:29
12	Q Is there anything that you wish to change	10:25:31
13	in your declaration at this time?	10:25:36
14	A Not that I can recall, no.	10:25:41
15	Q Who prepared your declaration?	10:25:44
16	A I prepared the declaration, along with	10:25:47
17	working with counsel.	10:25:51
18	Q And by "counsel," you mean Mr. Schreiner?	10:25:52
19	A Yes, I do.	10:25:57
20	Q Was anyone else besides you and	10:25:58
21	Mr. Schreiner involved in preparing your	10:26:02
22	declaration?	10:26:04

1 A No. I did have meetings with
2 Mr. Schreiner, along with Keystone members, early
3 on, to discuss some of the prior art and technical
4 issues in the case.

5 But it was just Mr. Schreiner and myself
6 that worked on this declaration that you see
7 before you, but there -- I did have discussions,
8 as I said, with members from Keystone.

9 Q So just so I understand correctly.

10 Keystone was not involved at all in
11 preparing your declaration?

12 A Well, we had technical discussions back
13 and forth. So in that respect, they were
14 involved.

15 Q Did Keystone contribute any words or
16 content towards your declaration?

17 A Not that I can recall.

18 Q Did you have any discussions regarding the
19 '286 patent or the prior art with Keystone that
20 were not in the presence of Mr. Schreiner?

21 A No.

22 Q So I'd like to switch gears a bit and turn

1	to your -- your background.	10:28:06
2	What is your current employment?	10:28:08
3	A I'm a professor in the School of	10:28:10
4	Electrical Engineering and Computer Science and	10:28:14
5	Engineering at Penn State University.	10:28:17
6	Q Any other current employment besides your	10:28:19
7	professorship?	10:28:27
8	A No.	10:28:31
9	Q You wouldn't consider your work as an	10:28:35
10	expert, technical expert, to be employment?	10:28:43
11	A Well, I would -- I was answering the	10:28:47
12	question outside of the consulting work for -- as	10:28:50
13	an expert witness.	10:28:53
14	Q I see.	10:28:55
15	How long have you worked as a professor at	10:29:06
16	Penn State?	10:29:09
17	A Well, I started at Penn State as a	10:29:09
18	research faculty member back in 1990. And I've	10:29:13
19	been there continuously.	10:29:19
20	I switched over to -- from a research	10:29:20
21	track to a faculty track in 2015. And I've been	10:29:26
22	in the school of EECS as a professor since that	10:29:30

1	time.	10:29:35
2	I did leave Penn State briefly, for an	10:29:36
3	18-month period, in 2000- -- 2002 to the beginning	10:29:39
4	of 2003.	10:29:48
5	Q Why did you leave Penn State during that	10:29:54
6	period?	10:29:56
7	A Well, that was right after 9/11, and there	10:29:58
8	was some work going on in the Department of	10:30:03
9	Defense that I wanted to be more involved in.	10:30:08
10	So I left Penn State to do research work	10:30:10
11	for a company out of Washington, D.C., and I was	10:30:15
12	trying to set up a remote office for that company	10:30:21
13	in, actually, State College, Pennsylvania, to get	10:30:25
14	some of my fellow engineers involved in that type	10:30:29
15	of work.	10:30:31
16	So, anyway, that's -- that's the reason I	10:30:32
17	left.	10:30:34
18	Q And then you returned in 2003, you said?	10:30:47
19	A I believe it was March of 2003, yes.	10:30:51
20	Q And you resumed your teaching role at that	10:30:54
21	time?	10:30:59
22	A Well, I returned to my research faculty	10:30:59

1 role at that time. And so I was in that role, as 10:31:04
2 I mentioned, from 2003 to 2015, where I switched 10:31:07
3 over to the teaching side. 10:31:10

4 Q What classes do you currently teach? 10:31:15

5 A I am currently teaching a wireless 10:31:26
6 communication systems and security class, I teach 10:31:28
7 computer networks, I teach neural networks 10:31:32
8 classes, and I teach mobile networks classes. 10:31:37

9 And I also teach a new course that 10:31:42
10 started, well, I guess, a year and a half, two 10:31:44
11 years ago, that is modern web development and 10:31:47
12 block chain. 10:31:52

13 Q Fair to say that your area of expertise is 10:31:53
14 wireless and communications? 10:32:14

15 ATTORNEY SCHREINER: Objection to form. 10:32:16

16 A My -- my expertise is in communication 10:32:17
17 networks, which involves different modalities, 10:32:22
18 specifically, sense -- a bunch of different 10:32:26
19 sensing technologies and -- which would include 10:32:28
20 RF, as well as video IR, multibanded information. 10:32:31

21 So I would say my expertise is centralized 10:32:40
22 within -- regarding wireless networks, but it 10:32:45

1 encompasses much broader than that, including 10:32:49
2 communication, computer networks, as I mentioned; 10:32:53
3 sensing, tracking, localization issues, etc. 10:32:56

4 Q About what percentage of your annual 10:33:01
5 income is from your work as a consulting -- as a 10:33:14
6 consultant, including expert work? 10:33:18

7 A Well, nominally, it's -- fluctuates, 10:33:20
8 depending upon how much work I have in a given 10:33:23
9 year, and how much I engage in. Typically, 10:33:26
10 between 20 and 40 percent. 10:33:29

11 Q Just so I understand correctly. 10:33:32

12 About 20 to 40 percent of your annual 10:33:38
13 income is from your work as a consultant, and the 10:33:40
14 remaining income is from your work at Penn State? 10:33:42

15 A That's correct. 10:33:47

16 Q About how much did you earn last year from 10:33:48
17 your consulting work as an expert? 10:33:54

18 A I don't recall. Last year, I don't 10:33:55
19 believe I had any trials. And if there is a 10:34:02
20 trial, that percentage would change because you 10:34:07
21 spend a lot more time at trial. 10:34:14

22 I'm going to guess it's definitely over a 10:34:16

1	hundred thousand.	10:34:19
2	Q You said you don't believe you had any	10:34:20
3	trials last year.	10:34:30
4	So in years where you do have one or more	10:34:31
5	trials, that number would increase above -- even	10:34:34
6	further above 100,000?	10:34:37
7	A Yes, yes.	10:34:38
8	Q Do you have any experience with web	10:34:39
9	programming or design?	10:34:44
10	A Yes, I have.	10:34:47
11	Q What experience have you had with those	10:34:48
12	technologies?	10:34:53
13	A With respect to web programming, that's,	10:34:56
14	obviously, a broad term.	10:34:59
15	Back in the -- starting back in	10:35:02
16	the early -- actually, mid 90s, I was part of an	10:35:05
17	effort that implemented a system for Conrail to do	10:35:08
18	rock slide detection for their -- safety with	10:35:12
19	respect to their rail systems.	10:35:17
20	And we developed -- as part of the	10:35:22
21	research effort, using seismic senses, video	10:35:25
22	sensors, as well as acoustic sensors, for	10:35:33

1 monitoring their track systems, we deployed -- 10:35:38
2 implemented and deployed a system where the system 10:35:41
3 would reach out to a -- a manager, for lack of a 10:35:45
4 better term; I don't remember his exact title -- 10:35:53
5 that if there was an event detected, we would 10:35:55
6 contact them, let them know that an event was 10:35:59
7 detected. 10:36:02

8 We would send out images and copies of the 10:36:03
9 seismic and acoustic data to them, and then we 10:36:10
10 would notify them of where it took place and when 10:36:16
11 it took place. 10:36:19

12 So we tagged the imagery and send it to 10:36:20
13 them so they can review it to see if they had to 10:36:22
14 make any changes to their trains running in that 10:36:25
15 area and send out crews to investigate or make any 10:36:28
16 safety calls. 10:36:32

17 But that was -- that -- as I said, that 10:36:33
18 was in the mid 90s. 10:36:38

19 From that time on, I worked in various -- 10:36:39
20 for various projects, research projects, for the 10:36:43
21 DOD. And a lot of those involved implementing 10:36:49
22 software that would be used to transmit 10:36:54

1 information in different modalities over the 10:37:01
2 network, the Internet, for transmitting and 10:37:08
3 keeping the analysts or members who were the 10:37:16
4 target audience for the information up to date. 10:37:18

5 That included wireless, but also wired 10:37:22
6 networks. 10:37:24

7 And then, as I got into the early 2000s, I 10:37:26
8 worked on an effort called "the global information 10:37:31
9 grid," which was focused on developing an 10:37:34
10 autonomous agent to assist war fighters. And it 10:37:39
11 was a multi-end data fusion engine. And that was 10:37:45
12 part of a very large, multi-year effort. And I 10:37:50
13 led a team of software developers, as well as 10:37:55
14 engineers, to develop our systems that would 10:37:58
15 perform this data fusion for the government. 10:38:00

16 And we integrated in with dozens and 10:38:04
17 dozens of different intelligent sources, including 10:38:07
18 video imagery, acoustics, multi-source -- open -- 10:38:11
19 open intelligence, such as newspapers, logistics, 10:38:17
20 for fusing that information to provide, basically, 10:38:22
21 responses and/or to keep analysts or the war 10:38:27
22 fighter informed of whatever they were -- what job 10:38:30

1 they were trying to perform. 10:38:33

2 And that was all done in the context of 10:38:35
3 web development, because our communication 10:38:38
4 networks, whether it was the defense grid or 10:38:41
5 whether it was the Internet itself, we had to 10:38:47
6 integrate in with various components of other 10:38:50
7 web-based applications, as well as presenting the 10:38:54
8 user with an interface that would work on devices 10:38:59
9 such as phones, all the way up into combat 10:39:06
10 operations centers where you have large resources 10:39:12
11 and large-scale computing resources available to 10:39:15
12 provide the combatant commanders or the analysts 10:39:20
13 the information they need that we were able to 10:39:27
14 assemble for them. 10:39:30

15 Q Thank you for that comprehensive answer. 10:39:31

16 I'd like to focus first on the -- the 10:39:33
17 first job you mentioned that you had, the Conrail 10:39:36
18 project for rock slide detection. 10:39:39

19 Was that web programming that involved the 10:39:44
20 Internet or a -- or an internal network to 10:39:46
21 Conrail? 10:39:54

22 A Well, it was implemented -- it -- we 10:39:54

1 designed it to be implemented in two ways. 10:39:56

2 One way was to be able to be use a -- 10:39:58

3 the -- the Internet, if it was available. So we 10:40:01

4 would have a dialup modem and -- within the 10:40:03

5 device, that was -- that was wayside, that was 10:40:08

6 along the tracks. 10:40:09

7 And then we also had a -- there was 10:40:13

8 basically a single-board computer in there that I 10:40:15

9 had a DSP operating on, digital single processor. 10:40:19

10 And then we had the possibility of walking 10:40:24

11 up to the device and, of course, plugging into the 10:40:26

12 device directly. 10:40:28

13 So there were different ways to 10:40:30

14 communicate with that. 10:40:32

15 The one way was to dial up via a modem 10:40:33

16 that was in the box, the wayside box. Back then, 10:40:39

17 we used the dialup modem for accessing the 10:40:42

18 Internet and then transmitting data. 10:40:51

19 Q So that -- that dialup modem would connect 10:40:58

20 to an ISP to provide Internet interconnectivity? 10:41:01

21 A That is my recollection of how we -- 10:41:07

22 that -- that instance was implemented. 10:41:11

1	Q Okay. And for the other two projects you	10:41:13
2	mentioned, the DOD project and the global	10:41:17
3	information grid project, I believe you -- you	10:41:19
4	said that those projects involved both internal	10:41:22
5	DOD networks and the Internet, correct?	10:41:27
6	A That is correct.	10:41:30
7	Q I'd like to turn to paragraph 46 and 47 of	10:41:44
8	your declaration.	10:42:00
9	Let me know when you're there.	10:42:05
10	A I will.	10:42:08
11	Q I believe it's on page 29 of the PDF.	10:42:09
12	A Okay. 46 and 47, you mentioned?	10:42:17
13	Q That's right.	10:42:20
14	A Yes, I'm there.	10:42:21
15	Q In these paragraphs, you opine regarding	10:42:22
16	the -- the level of skill of a POSITA, correct?	10:42:27
17	A Yes, I do.	10:42:35
18	Q And you opine that you generally agree	10:42:37
19	with the petitioner's POSITA definition, also	10:42:43
20	noting that lack of work experience could be	10:42:48
21	mitigated by additional education and vice versa.	10:42:50
22	Is that fair to say?	10:42:52

1	A Yes, it is.	10:42:54
2	Q And that definition that petitioner	10:42:56
3	presented was -- for a POSITA, was, "A bachelor's	10:43:01
4	degree in electrical engineering, computer	10:43:04
5	engineering, or computer science or equivalent,	10:43:06
6	plus approximately two years of work experience	10:43:09
7	with technologies relating to the video	10:43:12
8	annotation, book marking, and/or video	10:43:14
9	navigation."	10:43:17
10	Did I read that correctly?	10:43:18
11	A Yes, you did.	10:43:19
12	Q Does your -- did your skill level, as of	10:43:20
13	2006, satisfy this definition of a POSITA's skill	10:43:31
14	level?	10:43:38
15	A Yes, it does -- did, and, yes, it does.	10:43:39
16	Q So what -- what work experience did you	10:43:44
17	have with technologies relating to video	10:43:52
18	annotation, book marking, and/or video navigation	10:43:55
19	by the 2006 time frame?	10:43:58
20	A Well, as I mentioned, beginning in the	10:44:01
21	early 2000s, specifically, I mentioned the Conrail	10:44:06
22	work, where I had some video annotation experience	10:44:10

1	there, introduction to that.	10:44:13
2	But beginning in the early 2000s, working	10:44:16
3	with various video modalities and video -- video	10:44:19
4	itself, as well as still imagery, that was coming	10:44:25
5	from both national, tactical, and theater assets.	10:44:30
6	We would annotate those, provide the	10:44:34
7	information or the ability for analysts to be able	10:44:40
8	to annotate or bookmark specific elements within	10:44:43
9	the video to share that. And as part of that	10:44:46
10	global information grid, that three-year effort,	10:44:51
11	that was part and parcel for some of the	10:44:53
12	intelligence that we were fusing together to	10:44:56
13	provide to the analysts or decision-makers as part	10:44:58
14	of that ubiquitous automated information manager	10:45:01
15	agent that we were developing.	10:45:06
16	Q And you said that that work was in the	10:45:08
17	early 2000s?	10:45:17
18	A Correct.	10:45:18
19	Q So is it fair to say, then, that by the	10:45:19
20	early 2000s, you personally were involved in video	10:45:26
21	annotation work involving the Internet?	10:45:29
22	A Yes.	10:45:32

1 Q Okay. Are you aware of any other projects 10:45:33
2 that -- outside what you were working on, 10:45:41
3 involving video annotation on the Internet? 10:45:44

4 A Well, there were other projects that 10:45:49
5 were -- were seen through obscurance through the 10:45:51
6 2000s and into the 2010s, as well as different 10:45:58
7 frequency range outside the visual frequency 10:46:06
8 ranges we were using for providing, again, 10:46:09
9 analysts information regarding videos that I 10:46:14
10 worked on also. 10:46:19

11 And they involved, again, bookmarking 10:46:22
12 certain aspects -- certain parts of those videos 10:46:24
13 to share among, mainly, DOD components. So it 10:46:27
14 would be on classified networks. But there was 10:46:35
15 some unclassified elements that would go outside 10:46:39
16 of those boundaries and be transmitted over the 10:46:42
17 open Internet also. 10:46:47

18 Q So in that global information grid project 10:46:53
19 you worked on in the early 2000s, what was the 10:46:55
20 benefit of annotating videos? 10:46:58

21 A Well, our -- our agent was, as I 10:47:01
22 mentioned, a data fusion agent. And so the 10:47:04

1 challenge there was fusing data from many 10:47:07
2 different sources. 10:47:11

3 So if I was an analyst working in a given 10:47:13
4 theater, and I had a region of responsibility, I 10:47:15
5 would -- our agent would take in a description of 10:47:18
6 their role and what their job was to do, and then 10:47:21
7 things such as geographic boundaries, for example. 10:47:26

8 So we'd take all it -- that role 10:47:31
9 information, and what we would try to do is go out 10:47:33
10 and we would find intelligence. And I said -- as 10:47:36
11 I said, it could be open intelligence. It could 10:47:40
12 be on the classified side. And we would bring 10:47:42
13 that together, as well as message feeds, news 10:47:46
14 feeds, etc., and troll through that to put pieces 10:47:50
15 of information together and provide information to 10:47:55
16 the analyst to help them become more efficient and 10:47:57
17 more quick at making decisions. 10:48:01

18 So as part of that role, if there was 10:48:05
19 video that was available that was pertinent to the 10:48:08
20 job they were trying to perform, we would provide 10:48:11
21 links to that video that might be coming from, for 10:48:15
22 example, the DIA, Defense Intelligence Agency, or 10:48:18

1 other sources. 10:48:23

2 As I mentioned, they could be tactical 10:48:24
3 sources. It could be a dismounted soldier who 10:48:26
4 took video. 10:48:33

5 As a use case, for example, back in that 10:48:33
6 time frame, there were people of high interest 10:48:36
7 they were trying to identify. So you would have 10:48:38
8 soldiers at checkpoints taking snapshots, as well 10:48:41
9 as video, of individuals coming through 10:48:44
10 checkpoints that would be shared through the DOD 10:48:46
11 system. And then those would be tagged with 10:48:49
12 information about location, for example, 10:48:54
13 geolocation, where it was -- where the picture was 10:48:56
14 taken, where the video was taken. And we'd be 10:48:58
15 able to fuse that together, provide that to the 10:49:01
16 analyst. 10:49:03

17 And then the analyst would want to 10:49:04
18 annotate that and put a bookmark, for example, 10:49:05
19 into a video, or provide an annotation on an 10:49:10
20 imagery. 10:49:14

21 And so, as part of that effort, we had to 10:49:15
22 have that capability built into our -- our 10:49:17

1 interface, our agent. 10:49:19

2 Q So to give an example, say, like, you had 10:49:23
3 captured video from a checkpoint, and an analyst 10:49:26
4 saw there was individual in the video that was -- 10:49:29
5 you recognized as Osama bin Laden. He or she 10:49:31
6 would bookmark that portion of the video, that 10:49:35
7 section of the video, as Osama bin Laden so it 10:49:39
8 would be shared for intelligence purposes? 10:49:42

9 A They would be able to tag that 10:49:43
10 information, correct, and they would put in what 10:49:45
11 their notes were and/or be able to provide 10:49:48
12 hyperlinks to other documents that were being 10:49:52
13 shared around the system. And that would be -- be 10:49:54
14 able to be associated with that video, which would 10:49:58
15 then be back -- uploaded back into the -- the main 10:50:00
16 repository, whatever agency was in charge of 10:50:04
17 handling that -- that video or imagery. 10:50:07

18 Q So I'd like to turn to Exhibit 2014, which 10:50:24
19 is your CV. 10:50:29

20 A Okay. 10:50:34

21 Q Is Exhibit 2014 an accurate CV for 10:50:34
22 yourself? 10:50:45

1	A Yes.	10:50:45
2	Q Have you done any patent litigation expert	10:50:50
3	work involving video annotation or bookmarking or	10:51:02
4	video navigation?	10:51:06
5	A Not that I can recall.	10:51:41
6	Q Do you teach any courses at Penn State	10:51:43
7	involving video annotation, bookmarking, or video	10:51:50
8	navigation?	10:51:55
9	A Not focused on that. In my neural	10:51:56
10	networks class, obviously, a lot of the project	10:52:02
11	work and development work has to do with imagery	10:52:06
12	and video. But it's not focused on annotating	10:52:08
13	video or bookmarking video.	10:52:12
14	Q Okay.	10:52:20
15	ATTORNEY YAM: Now might be a good time	10:52:26
16	for an early break because I've got a long line of	10:52:27
17	questions coming up.	10:52:30
18	THE WITNESS: Okay.	10:52:31
19	THE VIDEOGRAPHER: We are now going off	10:52:34
20	record. The time is 10:52 A.M.	10:52:35
21	(Recess.)	10:52:38
22	THE VIDEOGRAPHER: We are now back on	11:00:02

1	record. The time is 10:59 A.M. -- 11:00 A.M.	11:00:04
2	BY ATTORNEY YAM:	11:00:09
3	Q Welcome back, Dr. Mahon.	11:00:09
4	A Thank you.	11:00:14
5	Q During the break, did you talk with	11:00:15
6	anybody?	11:00:18
7	A No, I did not.	11:00:18
8	Q I'd like to shift gears and turn to the	11:00:22
9	'286 patent, which is Exhibit 1001.	11:00:27
10	Let me know when you have that open.	11:00:32
11	A I have it open.	11:00:33
12	Q Great.	11:00:36
13	I'd like to turn to Figure 1A.	11:00:36
14	A Figure 1A, yes.	11:00:42
15	Q Great.	11:00:44
16	So I'd like to start by walking through	11:00:45
17	Figure 1A and getting your understanding of	11:00:47
18	what -- the various components in this figure.	11:00:51
19	Just to start, there is various servers	11:00:54
20	that are depicted towards the top of this figure;	11:00:57
21	is that fair to say?	11:01:02
22	A Yes.	11:01:03

1	Q And then there is a network 130, correct?	11:01:04
2	A That is correct.	11:01:10
3	Q And at the bottom of the figure, there are	11:01:12
4	Viewers 1 -- 132 and Editors 134, correct?	11:01:15
5	A That is correct.	11:01:21
6	Q So in this -- in Figure 1A of the '286	11:01:22
7	patent, is there a demarcation that represents a	11:01:36
8	server side of this system?	11:01:40
9	A Well, the application server is the -- on	11:01:41
10	this figure, is the interface to the general cloud	11:01:55
11	network 130, based on this diagram. And so the	11:02:02
12	server side would be on the top side of that	11:02:07
13	cloud, which would be depicting, in general, to	11:02:13
14	the person of ordinary skill in the art, the	11:02:18
15	Internet, for example.	11:02:21
16	Q What do you mean by "the top side of that	11:02:22
17	cloud"?	11:02:28
18	A So in the top side of the image of	11:02:31
19	Figure 1 -- I'm sorry -- Figure 1A, the top side	11:02:33
20	of the figure represents the server side, in	11:02:36
21	general.	11:02:42
22	Q Would the server side include components	11:02:46

1	beyond Application Server 110?	11:02:50
2	A Yes. It would include all the servers	11:02:57
3	listed.	11:03:00
4	Q So the -- for instance, the Cue Point	11:03:00
5	Server 114, that would be included in the server	11:03:04
6	side?	11:03:06
7	A That's on the service side of the network,	11:03:07
8	as depicted in this figure, yes.	11:03:10
9	Q So the Video Server 112, that -- that	11:03:12
10	server is also on the server side?	11:03:14
11	A Yes.	11:03:20
12	Q Authorization Server 122 is also on the	11:03:21
13	server side?	11:03:25
14	A Yes.	11:03:27
15	Q Would you consider the VEE 116 to be on	11:03:31
16	the server side?	11:03:37
17	A That is depicted as operating on the	11:03:39
18	server side of the network.	11:03:41
19	Q And there are components 136 and 138 on	11:03:46
20	the left side of the network cloud 130.	11:03:50
21	Do you see that?	11:03:53
22	A Yes, I do.	11:03:54

1	Q	Would those be considered on the server	11:03:58
2		side?	11:04:02
3	A	No.	11:04:02
4	Q	So for discussion purposes, the server	11:04:09
5		side would be everything within the -- the	11:04:12
6		outlined box 140?	11:04:15
7	A	Correct.	11:04:18
8	Q	Okay. What makes the server side, the	11:04:20
9		server side?	11:04:31
10	A	Well, to a POSITA, the server side, with	11:04:34
11		respect to a client server architecture, would	11:04:38
12		encompass the -- the side of the network where the	11:04:43
13		application is residing, and it's being accessed	11:04:49
14		from clients.	11:04:54
15		So the server side would be where, for	11:04:56
16		lack of a better term, the heavy footprint would	11:05:00
17		be. And then the client side would be where the	11:05:03
18		light footprint is.	11:05:05
19	Q	What do you mean by "heavy footprint" and	11:05:07
20		"light footprint"?	11:05:14
21	A	Typically, a server implementation is --	11:05:15
22		is architected such that -- and because of the	11:05:24

1 requirements for the resources needed to provide a 11:05:28
2 particular service. And it requires, as I 11:05:33
3 mentioned, significant resources. 11:05:36

4 So in the development of computer networks 11:05:40
5 over the years, over the decades, it was much more 11:05:43
6 realistic to have only certain installments or 11:05:48
7 certain architecture space for those heavy 11:05:54
8 clients, the -- the -- the equipment that would 11:05:57
9 have the computational resources and the memory 11:06:04
10 and the power to be able to provide and handle the 11:06:06
11 calculations and/or services that are being 11:06:10
12 presented to many users. 11:06:13

13 So it was a single point that would have 11:06:15
14 the resources to handle requests from many users. 11:06:17
15 So the heavy side is that kind of a single point 11:06:22
16 of access or a limited point of access. And then 11:06:23
17 the clients would be requesting services from 11:06:27
18 that -- what I termed the heavy footprint side. 11:06:30

19 And then the clients would typically be 11:06:35
20 considered lighter footprints, meaning they don't 11:06:37
21 have as many computing resources or memory. 11:06:40

22 Q Is another aspect of a -- a server versus 11:06:43

1 a client the fact that a server can be accessed by 11:06:52
2 multiple clients? 11:06:56

3 A That is the basic paradigm for a client 11:06:59
4 server architecture. 11:07:04

5 Q What do you mean by that? 11:07:05

6 A Well, you can deploy a server for a single 11:07:15
7 client. I mean, there is nothing wrong -- you can 11:07:18
8 do that, but it doesn't -- it doesn't make 11:07:21
9 practical sense, in terms of implementation. 11:07:22

10 So the protocols are designed -- for 11:07:26
11 example, all the protocols that we rely on for 11:07:28
12 Internet communications are designed to be able to 11:07:33
13 have a -- in the client server architecture, the 11:07:35
14 basic model being you have a single server 11:07:41
15 providing services to many users. 11:07:44

16 Q And you referred to "protocols." 11:07:50

17 What are you referring to when you refer 11:08:06
18 to "protocols"? 11:08:08

19 A Standards. 11:08:09

20 Q Can you name some examples? 11:08:11

21 A Sure. 11:08:13

22 Of course, we have the ISO stack, the 11:08:16

1 TCP/IP stack, which define various layers of the 11:08:20
2 protocol stack. And then, within each element of 11:08:25
3 the protocol stack, you have various protocols. 11:08:28

4 You have -- that are put together by, 11:08:31
5 typically, IEEE or other organizations, to define 11:08:34
6 and set up standards for systems communicating 11:08:39
7 with each other. 11:08:43

8 Q So by "protocols," you're referring to 11:08:51
9 communications protocols, in general? 11:08:55

10 A Yeah. It's a set of rules for sending 11:08:58
11 information back and forth and messages back and 11:09:01
12 forth in a system. 11:09:03

13 Q So in the case of the system illustrated 11:09:14
14 in Figure 1A of the '286 patent, the server side 11:09:24
15 is the server side because it can be accessed by 11:09:29
16 multiple clients? 11:09:32

17 A That certainly is part of the definition 11:09:35
18 and the -- what is depicted here, yes. 11:09:38

19 Q And that includes the -- then the multiple 11:09:41
20 clients includes Viewers 132 and Editors 134? 11:09:51

21 A It does, yes. 11:09:55

22 Q So staying on Figure 1A. 11:09:56

1 Is there a side that is the client side of
2 the system?

3 A In this figure, the clients are depicted
4 as 132 and 134, the viewers and the editors, as
5 part of the network depicted in Figure 1A.

6 Q And these clients 132 and 134 represent
7 the client side of the system in Figure 1A?

8 A They are definitely part of the client, as
9 depicted in Figure 1A.

10 Q What makes the client side, the client
11 side?

12 A Well, in the client server architecture,
13 as I mentioned before, the client is going to
14 request services from the server. And as
15 disclosed in the specification and as referenced
16 in that figure, as part of that architecture,
17 that's -- that's why they're considered clients.

18 Q I'd like to turn to Figure 1B.

19 A Okay. 1B, yes.

20 Q What is the server side in the system, as
21 depicted in Figure 1B?

22 A In 1B, the server side is going to be

1 everything within, basically, the Boxes 190, 164, 11:12:23
2 and 162. 11:12:29

3 Q So everything other than the viewers 182 11:12:31
4 and editors 184? 11:12:53

5 A In a client server architecture, yes. The 11:12:55
6 182 and 184 are the clients, as part of Figure 1B. 11:12:59

7 Q Okay. Let's turn back to Figure 1A. 11:13:25

8 And we just discussed that Figure 1A shows 11:13:34
9 an Application Server 110, correct? 11:13:37

10 A That is correct. 11:13:41

11 Q What functions does the Application Server 11:13:42
12 110 perform? 11:13:47

13 A In this figure, it is the interface to the 11:13:53
14 Internet for which the clients will reach out to 11:13:56
15 make contact. 11:14:00

16 Q What do you mean by the "interface to the 11:14:12
17 Internet"? 11:14:14

18 A In a client server architecture, there is 11:14:16
19 an address and a location, a logical location at 11:14:22
20 which a service -- an application will reach out 11:14:33
21 to a server to request access for the services, 11:14:36
22 for example. 11:14:41

1 And application servers is basically -- in 11:14:43
2 this diagram, is providing that interface. And 11:14:47
3 that interfaces to, as depicted here, network 130, 11:14:50
4 which is depicting the Internet. 11:14:55

5 Q And you referred to a location and a 11:14:58
6 logical location. 11:15:21

7 Would a URL be an example of such a 11:15:23
8 location? 11:15:26

9 A A URL is -- is an example of 11:15:27
10 human-readable location. It has to be mapped 11:15:32
11 with -- with IP address, but, yes. 11:15:36

12 Q Would a URL be an example of a location 11:15:59
13 that would be -- would apply to Figure 1A, this 11:16:03
14 system? 11:16:04

15 A You can certainly use -- there is nothing 11:16:10
16 in this figure that prohibits you from using an 11:16:12
17 URL to access the system depicted. 11:16:15

18 Q Is that the case also for Figure 1B? 11:16:24

19 A Yes. 11:16:31

20 Q Does the Application Server 110 perform 11:16:32
21 any other functions other than providing an 11:16:45
22 interface? 11:16:46

1 A The application server, as depicted in
2 this figure, is also connected to other servers.
3 And as part of this -- this diagram, it's showing
4 you communication flow between the application
5 servers and applications that may be running on
6 the server, as well as communications back and
7 forth between the servers.

8 Q And by "other servers," you're referring
9 to Cue Point Server 114 and Video Server 112?

10 A I am referring to those servers, as well
11 as the authorization server is depicted here as an
12 option for the application server.

13 Q How does the Application Server 110
14 provide an interface to the network?

15 A Well, I'm not sure what you mean by that
16 question.

17 Q What functionality or what technology is
18 involved in order for the Application Server 110
19 to provide an interface?

20 A Well, there is nothing specified in this
21 figure. You can use various protocols for
22 accessing the server. This is -- this is an

1 architectural diagram, and it's up to the 11:18:26
2 deployment of the system to be able to -- whoever 11:18:29
3 is designing the system to decide what type of 11:18:33
4 protocol is going to be used for accessing their 11:18:36
5 services as exposed by the application server. 11:18:38

6 Q Is there any hardware or software involved 11:18:43
7 for the Application Server 110 to provide the 11:18:54
8 interface to the network? 11:18:56

9 A I'm not sure what you mean by that 11:18:59
10 question. 11:19:01

11 Q I guess, stepping back. 11:19:01

12 The Application Server 110 is a physical 11:19:08
13 component, correct? 11:19:12

14 ATTORNEY SCHREINER: Objection. Form. 11:19:15

15 A So the application server depicted here is 11:19:16
16 certainly shown as a physical entity. 11:19:20

17 In terms of deployment, there's various 11:19:24
18 ways you can actually deploy the server. Even -- 11:19:27
19 so it was -- can be a hardware component. It can 11:19:30
20 be multiple pieces of hardware components that are 11:19:34
21 acting as the application server. 11:19:37

22 And that's just a pictorial to demonstrate 11:19:39

1 that the application server in this instantiation 11:19:43
2 is providing the control mechanism for the service 11:19:50
3 that's being offered. 11:19:53

4 Q At the end of the day, there is hardware 11:19:58
5 somewhere that performs these functions, correct? 11:20:01

6 ATTORNEY SCHREINER: Objection. Form. 11:20:03

7 A It depends on what you mean by 11:20:04
8 "functions." 11:20:06

9 In terms of interfacing, sure. There's 11:20:07
10 got to be copper, fiber, or RF interface into the 11:20:10
11 system. And that certainly encompasses 11:20:14
12 hardware -- silicon, motherboards -- somewhere in 11:20:18
13 the system. Network interface cards, etc. 11:20:21

14 Q Well, I was referring to the application 11:20:25
15 server itself, not Application Server 110. 11:20:26

16 I mean, at the end of the day, there's -- 11:20:29
17 whether it's in a physical computer in a basement 11:20:31
18 or, you know, some server in the cloud, there is 11:20:34
19 a -- a computer somewhere that handles those 11:20:37
20 functions, correct? 11:20:41

21 ATTORNEY SCHREINER: Objection. Form. 11:20:43

22 A There is computational resources that 11:20:45

1 handle that, yes. 11:20:48

2 Q And what are those computational 11:20:50
3 resources? 11:20:53

4 A Well, that would be allocated by who's 11:20:54
5 ever deploying the system. And they could be -- 11:20:59
6 as I mentioned before, they could come in various 11:21:03
7 instances. 11:21:06

8 It can be a heavy footprint device that 11:21:06
9 has a large -- you know, it could be a crate 11:21:11
10 computer, for example, to something light as a 11:21:13
11 bunch of light (ph) servers. 11:21:16

12 It could be deployed in many ways. 11:21:20

13 Q Is there also software involved in 11:21:26
14 deployment of the Application Server 110? 11:21:28

15 A There would be software and various types 11:21:30
16 of software running on any instantiation where 11:21:36
17 you're providing a server for clients to access. 11:21:40

18 Q Can you give some examples of the software 11:21:52
19 that would run to provide access to clients? 11:21:55

20 A Well, sure. 11:21:56

21 You have operating systems, fundamentally, 11:21:57
22 to be able to run in those software. It could 11:22:00

1 also include, basically, proprietary applications 11:22:05
2 for the system, as well as, I mentioned, various 11:22:10
3 protocols that are put into software to implement 11:22:12
4 the various protocols themselves; that is, the 11:22:16
5 communications, the messaging, putting that 11:22:20
6 together. 11:22:22

7 There is also -- could be, for example, 11:22:26
8 control messaging going between different servers. 11:22:31
9 So that could be, again, either proprietary or 11:22:34
10 based on a standard protocol. 11:22:37

11 Q You referred to operating systems 11:22:38
12 fundamentally, to be able to run software. 11:22:58

13 So, for instance, would Microsoft Windows 11:23:00
14 be an example of software or open operating 11:23:03
15 software for running applications to Server 110? 11:23:06

16 A There's -- certainly, you could use 11:23:10
17 Windows to do that. Yes. 11:23:14

18 Q So in the case of using Microsoft Windows 11:23:15
19 to implement Application Server 110, there would 11:23:25
20 be software running on the Windows OS to provide 11:23:28
21 the interface? 11:23:31

22 ATTORNEY SCHREINER: Objection. Form. 11:23:33

1 A I'm not sure what you mean by "provide the
2 interface."

3 Q Well, I believe you testified earlier that
4 Application Server 110, that its function is to
5 provide an interface through the network with
6 clients; is that correct?

7 A That is correct.

8 Q In the case of Microsoft Windows, how does
9 Microsoft Windows provide that interface?

10 A The server package for Microsoft Windows
11 would be an installment where it is deployed as
12 a -- in a client server architecture, would be
13 utilized, just like any other operating system, to
14 provide memory management and structure for the
15 programs running on that server to be able to
16 interprocess communication, for example, exchange
17 information, control memory mapping, etc., etc.

18 As far as the interface shown here, again,
19 it could be based on any standard interface. And
20 so you typically would have -- if it's a standard
21 Internet interface, you would have a network
22 interface card in that server, as a single

1 example. The operating system would have to have 11:25:08
2 drivers. So you'd have to utilize the particular 11:25:11
3 drivers that come packaged with, or you'd have to 11:25:14
4 integrate in other drivers associated with 11:25:17
5 interfacing to that network interface card to be 11:25:21
6 able to pull the packets in to start the process 11:25:23
7 and be able to decode the messages, for example. 11:25:26
8 Q You mentioned there is server packets for 11:25:30
9 Microsoft Windows that could be used to implement 11:25:55
10 Application Server 110 as a potential 11:25:58
11 implementation. 11:26:01
12 Do you know what -- what that server 11:26:02
13 package is called? For Microsoft Windows. 11:26:04
14 A I'm not sure what the current 11:26:09
15 instantiation of Microsoft server is. I'd have 11:26:19
16 to -- I'd have to refer -- reference that. 11:26:23
17 Q Do you know the name in the case of 11:26:28
18 previous versions of Microsoft Windows? 11:26:32
19 A Well, I've deployed Microsoft server 11:26:34
20 software in the past. And my recollection is a 11:26:40
21 little vague on that, exactly what the name of 11:26:51
22 that package was, because they've changed it 11:26:54

1 several times, in terms of referencing it. 11:26:58

2 It's -- it's a standard Windows operating 11:27:01
3 system for server deployments. 11:27:04

4 Q Okay. Do you have any other examples, 11:27:06
5 besides Microsoft Windows, of implementations for 11:27:36
6 Application Server 110? 11:27:42

7 A I'm sorry. The question you're asking is, 11:27:43
8 is there other operating systems that could be run 11:27:51
9 on the application server? 11:27:53

10 Q Any other examples of -- of software that 11:27:55
11 may be used to implement Application Server 110? 11:27:58

12 A It's not limited with respect to this -- 11:28:05
13 this instantiation as shown here in this figure. 11:28:09
14 Certainly, in the specification, they mentioned 11:28:12
15 you could have the VEE running as an application 11:28:14
16 on the application server. 11:28:17

17 Q Is the Application Server 110 a 11:28:18
18 significant component of the system of Figure 1? 11:28:45

19 ATTORNEY SCHREINER: Objection. Form. 11:28:50

20 A So I guess you'd have to provide me what 11:28:51
21 your definition of "significant component" is, 11:28:58
22 with respect to this figure, as well as this 11:29:00

1 specification for the '286. 11:29:03

2 Q Do you have a -- do you have an 11:29:07
3 understanding of what it means to be a significant 11:29:08
4 component? 11:29:11

5 A I don't understand what you mean by the 11:29:14
6 word "significant" in this case. In this image. 11:29:16

7 Q Would the system of Figure 1A operate 11:29:20
8 correctly or properly if Application Server 110 11:29:29
9 was absent? 11:29:32

10 A Well, in this figure, if you remove the 11:29:38
11 application server, there is no depiction of a 11:29:40
12 communication path to the Internet shown here. So 11:29:45
13 you'd have to have something that would interface 11:29:48
14 to be able to send the messages back and forth to 11:29:50
15 the -- between the server architecture, however 11:29:54
16 you're deploying it, and the clients as depicted 11:29:57
17 here. So if you remove that, you're -- you're 11:30:00
18 basically cutting the signal path. 11:30:02

19 So as far as that's concerned, sure, 11:30:05
20 it's -- it's -- it needs to be as depicted, some 11:30:09
21 point of communication with the Internet. 11:30:12

22 Q Okay. I'd like to turn next to the Cue 11:30:16

1 Point Server 114, which is depicted in Figure 1A.

11:30:25

2 What is the Cue Point Server 114?

11:30:28

3 A The cue point server is shown in this
4 architecture, with regards to Figure 1A and this
5 disclosures in the specification, providing cue
6 point -- remote cue point management and
7 modification for the clients as depicted in this
8 Figure 1A, remote clients, 132 and 134.

11:30:32

11:30:39

11:30:44

11:30:52

11:30:55

11:30:57

9 Q And what do you mean by "remote cue point
10 management"?

11:31:05

11:31:19

11 A Meaning it's a client server architecture.
12 Therefore, the cue point server is receiving
13 communications and information from the clients
14 and providing the service of being able to manage
15 the cue points, meaning modify the cue points, in
16 this case, for the -- for purposes of the deployed
17 services. And that's what's depicted here as
18 happening in the cue point server.

11:31:20

11:31:23

11:31:30

11:31:33

11:31:40

11:31:44

11:31:49

11:31:53

19 Q How does Cue Point Server 114 manage the
20 cue points?

11:31:55

11:32:18

21 A Well, as the spec discloses, the cue point
22 servers may store and/or serve cue point

11:32:20

11:32:49

1	information or pointers --	11:32:53
2	(Reporter clarification.)	11:32:57
3	A As the specification discloses, the cue	11:32:59
4	point servers may store and/or serve cue point	11:33:06
5	information or pointers to cue point information,	11:33:11
6	as an example.	11:33:13
7	Q Dr. Mahon, are you referring to a	11:33:17
8	particular column and line of the specification?	11:33:19
9	A I am referring to, yes, Column 7, as an	11:33:22
10	example, of the disclosures, and it's lines, it	11:33:26
11	looks like, 42 through 45, where they discuss the	11:33:34
12	cue point server.	11:33:37
13	Q And the excerpt from the specification you	11:34:06
14	just referenced, Column 7, lines 42 to 45, that	11:34:08
15	sentence refers to cue point information, correct?	11:34:16
16	A It does say "cue point information," 115.	11:34:22
17	Q Does cue point information relate to a cue	11:34:38
18	point?	11:34:43
19	A Cue point information is associated with	11:34:49
20	cue point, yes.	11:34:51
21	Q How is cue point information associated	11:34:52
22	with cue point?	11:34:54

1 A The cue point information is information 11:34:55
2 that is part of the -- could be part of the cue 11:35:06
3 point. So it could be, in various instances, a 11:35:13
4 POSITA would understand. It could, for example, 11:35:16
5 be a time reference. It could be an annotation 11:35:19
6 narrative, for example. 11:35:23

7 Q And an example of a cue point information 11:35:25
8 being a time reference, you're referring to, for 11:35:48
9 instance, a start time and/or an end time, as an 11:35:52
10 example? 11:35:55

11 A It could certainly encompass that, yes. 11:35:57

12 Q Does the Cue Point Server 114 perform any 11:36:01
13 other functions other than storing or serving cue 11:36:33
14 point information? 11:36:36

15 A Well, a POSITA would understand that the 11:37:10
16 cue point server would also be communicating, as 11:37:48
17 depicted in Figure 1A, with other elements 11:37:52
18 on the -- in the server side. So it would be 11:37:56
19 performing other functions in terms of messaging, 11:38:00
20 sending messages back and forth. 11:38:04

21 So it may have other processes running on 11:38:06
22 it to be able to perform that communication and 11:38:08

1	close those loops.	11:38:12
2	Q Would those communications include	11:38:13
3	requests to create a cue point, modify a cue	11:38:41
4	point, delete a cue point, for example?	11:38:47
5	A You're asking if the cue point server	11:38:49
6	would be making a request to...	11:39:04
7	Q Well, let me ask this differently. Let	11:39:11
8	me -- withdraw that question.	11:39:13
9	And ask -- go back a little bit.	11:39:14
10	What sort of communications and messaging	11:39:18
11	would be involved between Cue Point Server 114 and	11:39:20
12	other servers?	11:39:23
13	A Well, the POSITA would understand, as	11:39:25
14	depicted in that figure, that the application	11:39:35
15	server would have to cue the cue point server if a	11:39:38
16	request came in from a client, for example. So	11:39:46
17	there has to be some level of messaging going back	11:39:49
18	and forth between those, as well as, as depicted,	11:39:51
19	between the cue point server and the -- let me	11:39:54
20	just go back up to that figure, since we're	11:39:57
21	focused on that figure -- yeah. The video server,	11:40:02
22	for example, is shown there.	11:40:08

1 So from a POSITA's perspective, there's
2 got to be some messaging capability between those
3 devices within this depiction in Figure 1A of the
4 server side architecture.

5 Q How does Cue Point Server 114 maintain and
6 store cue points or cue point information?

7 A It can do it however it wants to. There
8 is no limitation, from the perspective of a person
9 of ordinary skill in the art, in how it's done.

10 Q Could you provide an example of how Cue
11 Point Server 114 could be implemented to maintain
12 and store cue points and cue point information?

13 A Sure. It can --

14 (Reporter clarification.)

15 A It could store it as a binary file.

16 Q Can you provide any other examples besides
17 binary files?

18 A It could store it as an ASCII file.

19 Q Any other examples?

20 A You could store it as an XML.

21 Q Any other examples?

22 A Not off the top of my head, but there is

1	no limitation on how that information can be	11:41:43
2	stored.	11:41:45
3	Q Could a database be used to store cue	11:41:48
4	point, cue point information, for Cue Point Server	11:41:52
5	114?	11:41:57
6	A Well, within all those descriptions that I	11:41:57
7	just said, you can consider any memory	11:42:03
8	architecture to be a database. It could be based	11:42:07
9	on binary input. It could be based on a text	11:42:10
10	format.	11:42:15
11	But a database could be certainly used to	11:42:16
12	save information and to store information.	11:42:21
13	Q And the database, in that instance, would	11:42:24
14	be used to manage the information as well?	11:42:33
15	A Well, if you are saving the information,	11:42:34
16	in terms of the scope of what it means to be	11:42:42
17	managing something, certainly, that information is	11:42:46
18	being utilized. So it would be part of the	11:42:48
19	system.	11:42:50
20	Q Are -- in the system of Figure 1A, are cue	11:43:05
21	points maintained and stored at any other	11:43:27
22	repository other than Cue Point Server 114?	11:43:30

1 A Can you ask that question again, please? 11:43:34

2 Q Sure. 11:43:42

3 In the system of Figure 1A, are cue points 11:43:43

4 maintained and stored at any other repository or 11:43:47

5 component other than Cue Point Server 114? 11:43:50

6 A As depicted in Figure 1A, the cue point 11:43:55

7 server is the element that -- in the figure, that 11:45:26

8 is -- as in I mentioned before, with respect to 11:45:31

9 Column 7, is providing the access points and 11:45:36

10 repository for the cue point information. 11:45:43

11 There is nothing else in that 11:45:46

12 architectural diagram that is shown as providing 11:45:49

13 that functionality, at least from the perspective 11:45:55

14 of this figure, to a person of ordinary skill in 11:45:59

15 the art. 11:46:01

16 Q Is the Cue Point Server 114 a significant 11:46:02

17 component of the system in Figure 1A? 11:46:14

18 ATTORNEY SCHREINER: Objection. Form. 11:46:18

19 A So the architectural diagram shows a cue 11:46:21

20 point server. Again, I'm not sure how you define, 11:46:26

21 in a client server architecture, particular 11:46:32

22 functionality as significant or nonsignificant, 11:46:36

1 given the interplay between the functionality and 11:46:41
2 the many myriad of ways you can deploy that 11:46:43
3 functionality in the client server architecture. 11:46:46

4 In that diagram, it's certainly shown as 11:46:52
5 an element, and, therefore, has a purpose. 11:46:53

6 Q So the system of Figure 1A would not 11:47:02
7 function correctly if Cue Point Server 114 were 11:47:05
8 missing or inoperative? 11:47:10

9 A Well, to provide cue point services, if 11:47:12
10 you did not have the cue point server running on 11:47:17
11 either the application server or the cue point 11:47:22
12 server itself, you cannot provide that service, at 11:47:25
13 least from the perspective of how this is depicted 11:47:29
14 in Figure 1A. So the service has to be provided 11:47:32
15 somehow. 11:47:35

16 Q So the system of Figure 1A relies on some 11:47:37
17 component to maintain and store cue point 11:47:43
18 information. 11:47:46

19 Is that fair to say? 11:47:46

20 A Yes. 11:47:49

21 Q Is there any particular software that 11:47:49
22 could be used to implement Cue Point Server 114? 11:48:29

1	A I'm not sure what you mean by that.	11:48:34
2	But, certainly, there is no restriction on	11:48:41
3	a proprietary, or otherwise, how that can be	11:48:43
4	implemented.	11:48:47
5	Q So, for example, referring back to	11:48:48
6	previous example, could Cue Point Server 114 be	11:48:54
7	eliminated using Windows Server?	11:48:56
8	A So the servers, as depicted in this	11:49:01
9	figure, as interconnected, separate elements, each	11:49:07
10	one of those would have to have some type of	11:49:13
11	control system running on it, which would be an	11:49:16
12	operating system.	11:49:18
13	The operating system doesn't necessarily	11:49:19
14	provide all the functionality for any particular	11:49:21
15	service. So you fundamentally have to have some	11:49:24
16	type of bootstrap and operating system on a	11:49:29
17	separate entity element in the system.	11:49:32
18	Beyond that, I can't really characterize a	11:49:37
19	better answer for your question.	11:49:40
20	Q Would a POSITA have recognized that Cue	11:49:42
21	Point Server 114 could be implemented as, for	11:50:10
22	instance, using Windows Server and a SQL database	11:50:12

1	server software?	11:50:16
2	A The cue point server could be deployed	11:50:21
3	with any operating system and could use any	11:50:27
4	management and/or application tool required to be	11:50:31
5	able to save information. There is no limitation	11:50:35
6	on that, from the perspective of a person of	11:50:37
7	ordinary skill in the art, as long as it meets the	11:50:40
8	requirements of the system design in terms of	11:50:44
9	response, responsiveness, etc.	11:50:47
10	Q I'd like to shift gears and -- but stick	11:50:49
11	with Figure 1A, but shift gears to the VEE 116.	11:51:15
12	Do you see that component in Figure 1A?	11:51:21
13	A Yes.	11:51:24
14	Q What is VEE 116?	11:51:27
15	A Video editing environment.	11:51:34
16	Q And for today's discussion, we can use	11:51:36
17	the -- these two terms, the acronym VEE for video	11:51:50
18	editing environment, and you'll know what I'm	11:51:55
19	referring to.	11:51:57
20	Sound good, for shorthand?	11:51:58
21	A Yes.	11:51:59
22	Q Great.	11:52:00

1	What is the video editing environment?	11:52:08
2	A The specification discloses that the video	11:52:17
3	editing environment, referring to the disclosures	11:52:38
4	in columns 9 and 10, that it's used in the system,	11:52:45
5	for example, to -- as a video player.	11:52:53
6	It could also be used for the clients to	11:52:59
7	access remotely. And it discloses that it may	11:53:06
8	provide editing capabilities to the -- or just	11:53:24
9	provide editing capabilities to -- obviously, to	11:53:30
10	the clients who are accessing the system.	11:53:32
11	Q How does a client access the VEE?	11:53:37
12	A It would make a request to the -- the	11:53:56
13	server, and then the server would provide the VEE	11:54:01
14	functionality to the client.	11:54:09
15	Q What would this client request look like?	11:54:16
16	A It would be set up based upon the	11:54:18
17	implemented procedures associated with the	11:54:25
18	service. Anytime you provide a service, you have	11:54:28
19	a set of messages that are sent back and forth.	11:54:32
20	So, typically, it would be via messaging from a	11:54:38
21	client.	11:54:46
22	(Reporter clarification.)	11:54:52

1	THE WITNESS: Via, V-I-A.	11:54:53
2	Q Are there any restrictions on what this	11:54:56
3	client requests, the VEE, would look like?	11:54:58
4	A I'm not sure what you mean by that	11:55:11
5	question.	11:55:13
6	Q Are there any restrictions on the form or	11:55:13
7	substance of client requests to the VEE within the	11:55:28
8	scope of the '286 patent and its invention?	11:55:32
9	ATTORNEY SCHREINER: Objection. Form.	11:55:36
10	A Yeah, it's a very broad question.	11:55:37
11	If a -- a POSITA would understand that if	11:55:40
12	you are making a request to a service, that you	11:55:44
13	have to have certain elements as part of that	11:55:47
14	request and message structure, and you would have	11:55:50
15	to follow that.	11:55:53
16	And that's within the understanding of a	11:55:54
17	POSITA, and conforms to the disclosures in the	11:55:56
18	'286. There is nothing unusual about the	11:56:02
19	disclosures in the '286.	11:56:05
20	Q Can you provide any examples of a request	11:56:07
21	that a client would make to access the VEE?	11:56:40
22	A Well, that's -- again, that's a	11:56:48

1	hypothetical.	11:56:56
2	You can structure -- if I'm designing the	11:56:58
3	system, I can structure it any way I want to for	11:57:00
4	making -- as a software engineer, for making that	11:57:06
5	request.	11:57:10
6	But I'm not really sure what you're	11:57:10
7	getting to in the question.	11:57:13
8	Q Well, does the request need to be some	11:57:15
9	proprietary protocol, or could that software	11:57:27
10	engineer use a standard protocol or an	11:57:32
11	off-the-shelf protocol to implement these	11:57:35
12	requests?	11:57:38
13	A So the messaging protocols that are	11:57:40
14	typically used, they can certainly use that UDP,	11:57:43
15	TCP, HTTP. They can use those protocols for	11:57:47
16	sending the messages and establishing the	11:57:51
17	connection.	11:57:54
18	The underlying message structures would be	11:57:55
19	determined by the actual software that's being	11:57:58
20	deployed to provide the services. That's how all	11:58:00
21	client server architectures are going to work.	11:58:04
22	Q Would another example of a messaging	11:58:08

1 protocol that could be used for the client request 11:58:31
2 to the -- the -- to the VEE be an HTTP GET 11:58:35
3 request? 11:58:42

4 A Again, it depends upon the design of the 11:58:44
5 system. You can certainly establish an H -- use 11:58:49
6 HTTP to establish connection to the system, and 11:58:53
7 HTTP itself could utilize TCP or UDP or even QUIC, 11:58:57
8 depending upon which variation or version of HTTP. 11:59:01

9 So with respect to that, the initial 11:59:08
10 request comes in, and then, in terms of providing, 11:59:13
11 for example, a, as disclosed in the specification, 11:59:17
12 video planner, that could be delivered to the user 11:59:24
13 in various -- there's various mechanisms to 11:59:28
14 deliver that video player capability to the user, 11:59:32
15 for example, to clients. 11:59:34

16 Q So I understand correctly. 11:59:36

17 So the '286 patent does not preclude the 11:59:42
18 use of HTTP in -- as an implementation for its 11:59:46
19 invention? 11:59:52

20 ATTORNEY SCHREINER: Objection. Form. 11:59:56

21 A So you're trying -- the '286 patent 11:59:57
22 discloses a system and the architecture in a 12:00:04

1 particular way to provide remote cue point editing 12:00:09
2 capabilities in a client server architecture. 12:00:13

3 A POSITA would understand that in a -- 12:00:16
4 such a deployment, there are various protocols 12:00:20
5 that can be used. And, certainly, a common tool 12:00:24
6 used in communications encompasses HTTP. 12:00:29

7 Q So a POSITA would have understood that 12:01:00
8 HTTP is a common tool that could be used to 12:01:03
9 implement the '286 patent? 12:01:08

10 ATTORNEY SCHREINER: Objection. Form. 12:01:11

11 A No, that's not what I said. 12:01:12

12 What I said was that HTTP is the -- one of 12:01:14
13 the possible common languages, common protocols, 12:01:19
14 that could be used for -- in a client server 12:01:23
15 architecture. It's plain vanilla. It doesn't 12:01:25
16 provide any specific functionality itself. It's 12:01:29
17 just for establishing messaging back and forth 12:01:31
18 between a client and a server. That's what it's 12:01:35
19 used for. 12:01:37

20 And in that context, there is no 12:01:38
21 limitation in the '286 for that fundamental, plain 12:01:41
22 vanilla communications structure. 12:01:45

Transcript of Mark Mahon, Ph.D.
Conducted on March 13, 2025

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1	ATTORNEY YAM: Let's go ahead and take a	12:01:54
2	break.	12:01:55
3	THE VIDEOGRAPHER: We are now going off	12:01:57
4	record. The time is 12:01 P.M.	12:01:59
5	(Recess.)	12:02:01
6	THE VIDEOGRAPHER: We are now back on	12:45:45
7	record. The time is 12:45 P.M.	12:45:51
8	BY ATTORNEY YAM:	12:45:56
9	Q Welcome back, Dr. Mahon.	12:45:56
10	A Thank you.	12:45:58
11	Q How was your breakfast?	12:45:59
12	A It was good. How was your lunch?	12:46:00
13	Q Good.	12:46:02
14	During the break, did you speak with	12:46:06
15	anyone regarding this case?	12:46:09
16	A I did not.	12:46:11
17	Q So I'd like to turn back to Figure 1A of	12:46:12
18	the '286 patent, Exhibit 1001.	12:46:20
19	A I'm going to the figure. Let me just zoom	12:46:31
20	out of it.	12:46:39
21	Okay. I'm there.	12:46:40
22	Q All right. And prior to the break, do you	12:46:41

1	recall that we were discussing the VEE 116?	12:46:44
2	A Yes.	12:46:47
3	Q Is the VEE software?	12:46:48
4	A It would typically be deployed as	12:46:59
5	software.	12:47:01
6	Q Does that mean the VEE is a software	12:47:02
7	application, then?	12:47:05
8	A It's not restricted to be software, but it	12:47:06
9	can certainly be software, and it would be an	12:47:14
10	application, in that instance.	12:47:19
11	If it included hardware components, then	12:47:20
12	it would also include software. So it would have	12:47:22
13	an application running on that hardware.	12:47:25
14	Q Could the VEE be implemented as a website	12:47:27
15	or web page?	12:47:42
16	A You could deliver the capabilities for	12:47:46
17	the environment via access through web access if	12:47:55
18	you wanted to. But the actual capabilities would	12:48:03
19	have to be -- have underlying software application	12:48:06
20	to deliver that functionality.	12:48:09
21	Q And what underlying software application	12:48:11
22	would be involved, in that case, of web access?	12:48:24

1 A It depends on how the designer wants to 12:48:32
2 implement it. 12:48:34

3 But, for example, if you're talking about 12:48:35
4 a particular use case, they could use a -- any one 12:48:37
5 of a number of streaming protocols to deliver 12:48:42
6 streaming video or video to the user. So one of 12:48:45
7 those protocols could be used after the user 12:48:53
8 initially accesses, in your -- your hypothetical, 12:48:56
9 via the -- the -- an HTTP request or a web page 12:48:59
10 request. 12:49:02

11 Q So just so I understand you correctly. 12:49:03

12 The VEE could be implemented as -- as web 12:49:06
13 access based on a software application? 12:49:11

14 A Well, this is a client server 12:49:15
15 architecture, which definitely means you're 12:49:17
16 accessing it via the Internet, which colloquially 12:49:20
17 means via the web, to access the capabilities. 12:49:25

18 So, by definition, it's delivered as a web 12:49:28
19 capability. 12:49:31

20 Q So in that instance, the client accesses 12:49:32
21 the VEE via a web page? 12:49:36

22 A No. I didn't say that. 12:49:41

1 I said the capability is delivered via the 12:49:43
2 web. You could use a browser, or you can have a 12:49:48
3 particular deployed application that reaches out 12:49:51
4 to the VEE and delivers the content to that 12:49:55
5 application on the client. There is various ways 12:49:57
6 to do it. 12:50:01

7 Q If I understand you correctly, that one -- 12:50:02
8 one way is to use a browser to access the VEE? 12:50:07

9 A What I said was, you can use a browser to 12:50:12
10 access the client server architecture. That is, 12:50:18
11 in this case, the server capabilities. And then 12:50:20
12 the underlying capabilities of that server, 12:50:23
13 whatever service they're providing you, the user 12:50:27
14 would utilize those services to request access to 12:50:29
15 the VEE. 12:50:33

16 It's not fundamentally -- just because 12:50:34
17 you're accessing a web page, for example, doesn't 12:50:36
18 mean you're able to access the VEE capabilities 12:50:38
19 without other software running in the system. 12:50:42

20 Q But, ultimately, one potential 12:50:49
21 implementation is a client, using a browser, 12:51:07
22 accessing a particular web page and ultimately 12:51:12

1 gaining access to the VEE, correct?

12:51:15

2 ATTORNEY SCHREINER: Objection. Form.

12:51:18

3 A What I was saying is, you can -- you can
4 use a browser, which is a mechanism for accessing
5 a web -- web service that is a web page, but that
6 doesn't automatically say that you don't need or
7 encompass the ability to add -- or to access all
8 the services available. It's just a front end
9 door mechanism to access the server itself. And
10 everything underlying it would have to be
11 dependent upon how the software engineers
12 implemented the service capabilities, which, if
13 they had various plug-ins and other elements that
14 are are being delivered to sort of provide the
15 user that remote capability, sure. They could --
16 they could utilize -- continue to utilize that
17 particular protocol, but they could use other
18 protocols and other applications to implement it.

12:51:19

12:51:24

12:51:28

12:51:35

12:51:40

12:51:43

12:51:48

12:51:52

12:51:55

12:51:57

12:52:01

12:52:04

12:52:07

12:52:09

12:52:12

12:52:14

19 Q Right. I wasn't trying to be limiting,

12:52:17

20 but I'm just trying to understand what -- what are

12:52:20

21 some potential implementations here.

12:52:22

22 So as I understand you correctly, there

12:52:26

1 may be various protocols involved and, you know, 12:52:31
2 various intermediary software elements, but in the 12:52:33
3 end, a client goes to a web browser, types in a 12:52:40
4 URL, and, at some point, accesses a user interface 12:52:44
5 for the VEE; is that right? 12:52:52

6 ATTORNEY SCHREINER: Objection. Form. 12:52:54

7 A Well, again, the -- you can -- the HTTP, 12:52:55
8 or the web access request, is really just kind of 12:53:02
9 knocking on the front door of the server, which 12:53:05
10 opens up communications, opens up the door. 12:53:09

11 How those particular services are 12:53:11
12 delivered is dependent upon your particular use 12:53:13
13 case and a use case for the service 12:53:15
14 implementation. 12:53:18

15 Can it be done, theoretically, within a 12:53:20
16 browser? Sure. Does it have to be done? No. 12:53:24
17 That way? No. 12:53:31

18 Q But it could be done via a browser, like 12:53:32
19 you said? 12:53:36

20 A With other capabilities delivered to the 12:53:39
21 client device or required of the client device to 12:53:47
22 be able to deliver that, it's possible. 12:53:49

1 Q What do you mean by "it's possible"?

12:53:52

2 A Meaning, you can build a system utilizing
3 initial access via HTTP request to the service,
4 and then the services are delivered based upon
5 other requirements. You don't have all the
6 fundamental capabilities of a video editing
7 environment inherent in a simple HTTP request or
8 HTTP protocol itself.

12:54:11

12:54:15

12:54:20

12:54:23

12:54:30

12:54:33

12:54:39

9 Q But in the case that those other
10 components and features are included, ultimately,
11 a client accesses the VEE via its web browser,
12 right?

12:54:43

12:54:46

12:54:53

12:54:57

13 ATTORNEY SCHREINER: Objection. Form.

12:54:59

14 Q So you could -- again, you could access
15 the system via that request in terms of requesting
16 the service. Actual delivery of services is
17 dependent upon the use case context.

12:55:08

12:55:10

12:55:13

12:55:19

18 And, you know, there is an infinite number
19 of ways you can do that, really, to deliver
20 capabilities to a remote client.

12:55:21

12:55:26

12:55:33

21 And so, beyond that. I don't know how
22 else to characterize it.

12:55:35

12:55:36

1 Q But, yes or no, one of those ways is via 12:55:41
2 web browser to the VEE? 12:55:45

3 Yes? 12:55:46

4 ATTORNEY SCHREINER: Objection. Form. 12:55:48

5 A Yeah, I'm not -- so when you're saying 12:55:49
6 "yes or no," yes or no with reference to can you 12:55:51
7 access a server via an HTTP request? 12:55:53

8 Is that what your question is? 12:55:59

9 Q My question is whether one -- one option 12:56:01
10 for the VEE is being accessed by a client via a 12:56:05
11 web browser. 12:56:12

12 Is that one scenario encompassed by the 12:56:13
13 '286 patent? 12:56:19

14 A Well, it would depend upon the 12:56:20
15 capabilities of the web browser and the 12:56:22
16 requirements of the VEE to make that delivery, the 12:56:25
17 service -- the requirements to make that delivery. 12:56:30

18 Q What requirements of the VEE are required 12:56:32
19 to make that delivery? 12:56:56

20 A It's up to the software engineers who 12:56:56
21 design the service, and, therefore, define the 12:57:02
22 requirements of the clients to be able to access 12:57:06

1	their -- their service that they're offering.	12:57:09
2	Q So these requirements are requirements	12:57:13
3	for -- based on the software engineers who design	12:57:21
4	the service?	12:57:26
5	A How they design to implement the service	12:57:29
6	would put restrictions on how the service is	12:57:32
7	delivered, yes.	12:57:36
8	Q So in the case that the VEE is accessed	12:57:39
9	via the web, is a web server involved in accessing	12:58:15
10	the VEE?	12:58:20
11	ATTORNEY SCHREINER: Objection. Form.	12:58:23
12	A You're -- you're talking about an	12:58:24
13	architect -- give me more specifics about the	12:58:30
14	architecture you're envisioning, and I can answer	12:58:32
15	the question.	12:58:35
16	Q Well, before, we had talked about the	12:58:38
17	Application Server 110 being an interface to the	12:58:42
18	network.	12:58:45
19	Do you recall that?	12:58:46
20	A Yes.	12:58:47
21	Q Does that interface involve a web server?	12:58:47
22	A It could.	12:58:55

1 Q And what is a web server, in your view? 12:58:56

2 A Well, a -- given the context of our 12:59:12

3 discussion, you're focusing on a web server that 12:59:16

4 is responding to HTTP requests. That's a 12:59:19

5 possibility. That's not the only possibility, but 12:59:23

6 it is a possibility. 12:59:25

7 Q It's a possibility that's encompassed by 12:59:31

8 the '286 patent? 12:59:32

9 A There is nothing in the '286 that 12:59:35

10 precludes access to the application server or 12:59:38

11 limits it to a particular protocol. 12:59:42

12 Q So that's a "yes," that a web server 12:59:44

13 responding to HTTP request is encompassed by the 12:59:50

14 '286 patent? 12:59:53

15 ATTORNEY SCHREINER: Objection. Form. 12:59:55

16 A The '286 is disclosing a client server 12:59:59

17 architecture, and in the client server 13:00:03

18 architecture, certainly, you could request access 13:00:05

19 to the server's capabilities and which services 13:00:08

20 they're providing via initial HTTP request or 13:00:14

21 connection. But after that, obviously, you can 13:00:17

22 implement it in various ways following. 13:00:23

1	Q What functions does the VEE need to	13:00:51
2	provide in the context of the '286 patent?	13:00:54
3	ATTORNEY SCHREINER: Objection. Legal	13:01:08
4	conclusion.	13:01:09
5	A Could you repeat your question, please?	13:01:49
6	Q Sure.	13:01:50
7	What functions does the VEE need to	13:01:51
8	provide in the context of the '286 patent?	13:01:53
9	ATTORNEY SCHREINER: Objection. Calls for	13:01:57
10	a legal conclusion.	13:01:58
11	A So I can tell you, I could speak to the	13:01:59
12	claim language that's -- has been petitioned in	13:02:07
13	this case, and we've talked about the disclosures	13:02:11
14	of those claim elements and what is disclosed in	13:02:14
15	those claim elements.	13:02:17
16	But beyond that, I'm not sure how I can	13:02:19
17	answer your question.	13:02:21
18	Q Let's go ahead and turn to the claim	13:02:24
19	language.	13:02:26
20	You understand that Claim 13 of the '286	13:02:29
21	patent is one of the challenged claims, correct?	13:02:43
22	A Correct.	13:02:47

1 Q Does Claim 13 of the '286 patent cover the 13:03:09
2 arrangement that's illustrated in Figure 1A of the 13:03:18
3 '286 patent? 13:03:23

4 ATTORNEY SCHREINER: Objection. Legal 13:03:28
5 conclusion. 13:03:29

6 A You're asking me if a POSITA reading 13:03:36
7 Claim 13 would be able to look at Figure 1A and 13:04:07
8 decide whether Claim 13 defines anything outside 13:04:12
9 the disclosed architecture? 13:04:20

10 Is that what your question is? 13:04:21

11 Q My question is whether Figure 1A of the 13:04:24
12 '286 patent reads on Claim 13. 13:04:28

13 ATTORNEY SCHREINER: Objection. Legal 13:04:38
14 conclusion. Scope. 13:04:39

15 A Figure 1A is in the specification as -- 13:04:54
16 just go to that figure again. 13:05:00

17 So in column 11, the spec specifically -- 13:05:02
18 down in lines, roughly, 32 through 38, are 13:06:23
19 discussing that Figure 1A is an exemplary 13:06:30
20 embodiment of the invention within the four 13:06:35
21 corners of the specification. 13:06:39

22 And then it says, "The systems described 13:06:40

1 herein references Figures 1A and 1B should be
2 construed as only exemplary systems of the
3 invention, and the invention should be construed
4 broadly to encompass all systems which may
5 effectuate the invention."

6 So the patent specification is saying that
7 Figure 1A's a particular example. And I don't
8 know how to characterize it beyond that.

9 Q Well, my question wasn't whether the
10 Claim 13 is limited to Figure 1A. I'm not saying
11 that.

12 My question is whether you -- looking at
13 Figure 1A, does Claim 13 read on it?

14 ATTORNEY SCHREINER: Objection. Legal
15 conclusion. Scope.

16 A Are you asking about a particular opinion
17 that I assert in my declaration?

18 Q Well, you've relied upon Figure 1A in your
19 declaration, haven't you?

20 ATTORNEY SCHREINER: Objection. Form.

21 Q This is at paragraph 55 of your
22 declaration.

1	A I reference Figure 1A in paragraph 55.	13:08:18
2	Q So you rely on that reference to Figure 1A	13:08:27
3	in Paragraph 55 of your declaration, right?	13:08:29
4	ATTORNEY SCHREINER: Objection. Form.	13:08:32
5	A Well, I reference Figure 1A for	13:08:35
6	illustrating the various components of the	13:08:37
7	disclosed system, the '286.	13:08:39
8	Q So you're familiar with Figure 1A of the	13:08:45
9	'286 patent?	13:08:48
10	A Yes.	13:08:49
11	Q We discussed it at for quite a bit of time	13:08:50
12	this morning, didn't we? Figure 1A?	13:08:53
13	A Yes, we have spent time discussing 1A,	13:08:57
14	beginning this morning.	13:09:02
15	Q So given that you're familiar with	13:09:05
16	Figure 1A of the '286 patent, does Figure 1A --	13:09:07
17	(Reporter clarification.)	13:09:19
18	ATTORNEY YAM: Sure.	13:09:20
19	Q So does Figure 1A, if implemented as	13:09:20
20	illustrated, satisfy Claim 13?	13:09:23
21	ATTORNEY SCHREINER: Objection. Scope.	13:09:26
22	Legal conclusion. Form.	13:09:31

1 A In my declaration, I utilize Figure 1A to 13:09:40
2 reference the various disclosed components of the 13:10:28
3 invention in the '286 patent. 13:10:33

4 I don't rely on 1A specifically to show 13:10:38
5 any mapping of -- of -- or reading of the Claim 13 13:10:42
6 onto it or not. I just show the -- I'm discussing 13:10:49
7 the particular capabilities, as disclosed within 13:10:52
8 the figures, with respect to the disclosures 13:10:55
9 within the four corners of the patent. 13:10:57

10 Q Well, then, is there anything in Figure 1A 13:10:59
11 that prevents it from reading on Claim 13? 13:11:23

12 ATTORNEY SCHREINER: Objection. Scope. 13:11:28
13 Legal conclusion. Form. 13:11:29

14 A So from the perspective of a POSITA, I 13:11:34
15 don't understand your question. Because Figure 1A 13:11:44
16 is used as an illustration, with respect to the 13:11:46
17 disclosures in the specification and the 13:11:50
18 capabilities as an exemplar. 13:11:53

19 The claim elements are -- are the actual 13:11:57
20 disclosure of the invention. And the mapping 13:12:03
21 would -- would require someone to sit down and -- 13:12:09
22 and compare it to a -- a definition or a -- you 13:12:12

1 know, for example, a particular protocol to say 13:12:19
2 whether the particular implementation is met by 13:12:22
3 the pictorial representation in Figure 1A, and 13:12:25
4 then decide whether they map to the claim 13:12:30
5 elements, is my understanding of how that process 13:12:32
6 would work. 13:12:36

7 I don't know how else to answer that 13:12:36
8 question. 13:12:37

9 Q And that's not a process you've 13:12:38
10 undertaken? In -- 13:12:59

11 A I have not done an infringement 13:13:03
12 analysis -- 13:13:08

13 (Reporter clarification.) 13:13:08

14 Q And that's not a process you've undertaken 13:13:08
15 in the context of Figure 1A? 13:13:11

16 A I have not done an infringement analysis 13:13:13
17 in this case. 13:13:15

18 Q Well, I wasn't referring to an 13:13:16
19 infringement analysis. 13:13:20

20 I was simply asking whether you've 13:13:21
21 compared Figure 1A to Claim 13, in preparing your 13:13:23
22 declaration. 13:13:27

1	ATTORNEY SCHREINER: Same objection.	13:13:27
2	Scope. Legal conclusion. Form.	13:13:36
3	A I used Figure 1A to represent what's	13:13:37
4	disclosed in the specification. And you see that	13:13:40
5	in my declaration, as we've discussed.	13:13:44
6	And then I further, with respect to the	13:13:50
7	challenged claims, in my declaration, respond to	13:13:52
8	the petition and the petitioner's expert	13:13:56
9	declaration to those asserted claims, and rely on	13:14:01
10	the references to the specification to respond to	13:14:06
11	those claim -- those challenges to those	13:14:09
12	particular claims.	13:14:14
13	Q I don't think you answered my question.	13:14:18
14	I'm asking whether you compared Figure 1A	13:14:33
15	to Claim 13 during the course of preparing your	13:14:35
16	declaration.	13:14:37
17	Is that a "yes" or a "no"?	13:14:38
18	ATTORNEY SCHREINER: Same objection.	13:14:42
19	Scope. Legal conclusion. Form.	13:14:45
20	A And the way I answered the question	13:14:49
21	previously, I don't know how to characterize it	13:14:52
22	otherwise in my process for -- for putting	13:14:56

1	together my declaration.	13:14:58
2	Q Well, it's a yes-or-no question.	13:15:04
3	Did you compare the Claim 13 to Figure 1	13:15:07
4	or not?	13:15:11
5	ATTORNEY SCHREINER: Objection. Scope.	13:15:14
6	Form. Legal conclusion.	13:15:16
7	A Figure 1A is referenced in my declaration	13:15:21
8	with respect to discussing the disclosures in the	13:15:28
9	patent. And then I perform an analysis in	13:15:32
10	response to the petition, and the expert's	13:15:37
11	declaration submitted along with the petition, to	13:15:41
12	the challenged claims.	13:15:45
13	Q Do you rely on Figure 1A in interpreting	13:15:46
14	the language of Claim 13??	13:16:02
15	A Figure 1A was part of my analysis of the	13:16:19
16	patent itself and what's disclosed in the patent.	13:16:21
17	My analysis of the claim language, as I	13:16:24
18	mentioned, is in response to the assertions made	13:16:27
19	in the petition and the expert's declaration.	13:16:31
20	Certainly, my analysis of the '286 patent	13:16:34
21	came into play in terms of my response to the	13:16:37
22	challenges with respect to those claims.	13:16:41

1 Q All right. I'd like to focus on the 13:16:53
2 particular claim limitations, starting with what 13:17:19
3 we labeled as Limitation 13.1. 13:17:23

4 Dr. Mahon, do you have the claim 13:17:27
5 limitations in front of you with those -- those 13:17:32
6 labels? 13:17:34

7 A One second, please. 13:17:35

8 I don't have the claim -- those specific 13:17:47
9 claim labels laid out in front of me for each 13:17:52
10 claim. I can reference the patent '286 for that, 13:17:55
11 I guess. 13:18:05

12 ATTORNEY SCHREINER: Stephen -- 13:18:30

13 ATTORNEY YAM: At least certain 13:18:34
14 limitations are provided in Paragraph 79 of your 13:18:34
15 declaration. 13:18:38

16 But for completeness, why don't I provide 13:18:38
17 a copy of the petition, which includes a list of 13:18:47
18 the claims. 13:18:52

19 Q So I've uploaded into the chat, document 13:19:16
20 entitled, "Petition for Inter Partes Review of 13:19:18
21 U.S. Patent Number 8,307,286," and this is in 13:19:20
22 IPR2024-00710." 13:19:25

1	Dr. Mahon, let me know when you've got	13:19:42
2	that up.	13:19:46
3	A Okay. I've downloaded it, and I have	13:19:51
4	access to it.	13:19:53
5	Q Great.	13:19:54
6	So the claim listing starts at Page 10 of	13:19:54
7	the PDF.	13:19:57
8	A Page 10. Okay. I'm at Page 10.	13:19:59
9	Q Do you see the start of Claim 13?	13:20:05
10	A Yes, I do.	13:20:06
11	Q With the labels for respective claim	13:20:07
12	limitations, 13.P, 13.1, etc.?	13:20:10
13	A Yes, I see them.	13:20:15
14	Q Great.	13:20:20
15	So Limitation 13.1 recites, "Providing a	13:20:25
16	computer system having at least one computer	13:20:29
17	readable medium, comprising a video editing	13:20:31
18	environment, and being disposed at a server side	13:20:35
19	public network."	13:20:38
20	Did I read that correctly?	13:20:41
21	A Yes.	13:20:43
22	Q What is the computer system as recited in	13:20:44

1 Limitation 13.1?

13:20:52

2 A It's a -- the system that, in this
3 element, would include those particular sub
4 elements, which would be a computer-readable
5 medium, and also a video editing environment, on
6 the server side and public network.

13:21:02

13:21:08

13:21:15

13:21:18

13:21:23

7 So within Element 13.1, it has -- it's
8 disclosing that that computer system has at least
9 one computer-readable medium, video-editing
10 environment -- that includes a video-editing
11 environment, and is on the public side of the
12 network. So that's what's being talked about in
13 13.1.

13:21:26

13:21:32

13:21:35

13:21:40

13:21:43

13:21:44

13:21:47

14 Q And earlier today, we had talked about
15 what it means to be disposed at a server side and
16 public network.

13:21:48

13:21:52

13:21:58

17 Do you recall that?

13:21:59

18 A Yes.

13:22:00

19 Q Our discussions earlier today regarding
20 that language, does that apply to the language of
21 Claim Limitation 13.1?

13:22:01

13:22:03

13:22:07

22 A As I recall our discussion with respect to

13:22:11

1 client server architecture, when it's talking 13:22:15
2 about, in this element, disposed at a server side 13:22:21
3 of a public network, yes, that's -- that map -- or 13:22:23
4 that is what we were discussing before. 13:22:28

5 Q And earlier today, we were also discussing 13:22:30
6 a video-editing environment. 13:22:44

7 Do you recall that, in the context of the 13:22:46
8 '286 disclosure? 13:22:48

9 A Yes, I do. 13:22:49

10 Q And you see here that Claim 13:22:52
11 Limitation 13.1 recites a video-editing 13:22:58
12 environment, correct? 13:23:00

13 A Yes, it does. 13:23:02

14 Q Would your testimony earlier today 13:23:07
15 regarding a video-editing environment apply to the 13:23:11
16 term as recited as the video-editing environment 13:23:17
17 in Limitation 13.1? 13:23:20

18 ATTORNEY SCHREINER: Objection. Form. 13:23:26

19 A With respect to Element 13.2? 13:23:27

20 Q 13.1, the element that recites a 13:23:34
21 video-editing environment. 13:23:37

22 A Oh, I see. 13:23:42

1	Q Let me ask the question again so it's...	13:23:43
2	Would your testimony earlier today,	13:23:45
3	regarding a video-editing environment or VEE,	13:23:48
4	would that testimony apply to the video-editing	13:23:52
5	environment term as recited in Limitation 13.1?	13:23:58
6	A Earlier today, we discussed what the	13:24:03
7	disclosure in the '286 patent was, regarding a	13:24:09
8	video-editing environment.	13:24:12
9	This claim language is discussing or	13:24:14
10	using -- disclosing that the invention includes	13:24:19
11	a -- or provides a computer system having at least	13:24:27
12	one computer-readable medium comprising a	13:24:29
13	video-editing environment.	13:24:33
14	So within that context, yes.	13:24:34
15	Q So what is a video-editing environment as	13:24:36
16	recited in Limitation 13.1?	13:24:58
17	A It's an -- something that's part of the	13:25:00
18	computer-readable medium, and it's provided via	13:25:11
19	the computer system. It has that	13:25:17
20	computer-readable medium as disclosed in 13.1.	13:25:20
21	Q Are there any other requirements	13:25:28
22	associated with a video-editing environment as	13:25:31

1 recited in Limitation 13.1? 13:25:33

2 A Given that it's part of that computer 13:25:38
3 system that has to be disposed at the server side 13:25:43
4 of a public network. 13:25:46

5 Q So are there any other further 13:25:48
6 requirements as to a video-editing environment, as 13:26:08
7 recited in Limitation 13.1, beyond the ones that 13:26:10
8 that you've just listed? 13:26:15

9 A Not within that element, no. 13:26:16

10 Q So I'm not sure you answered my previous 13:26:26
11 question, which is, what is a video-editing 13:26:52
12 environment as recited in Limitation 13.1? Is 13:26:55
13 there anything besides what's the -- the 13:26:58
14 surrounding language in that limitation that's 13:27:02
15 required of the video-editing environment? 13:27:04

16 A As far as claim language in 13.1 is 13:27:12
17 concerned -- and we're focusing on that -- those 13:27:18
18 elements are -- are as we discussed with respect 13:27:21
19 to Claim Element 13.1. 13:27:23

20 Q What is a public network in the context of 13:27:30
21 Limitation 13.1? 13:29:00

22 A To a person of ordinary skill in the art, 13:29:01

1	the plain and ordinary meaning of that public	13:29:09
2	network would be in contrast to a private network.	13:29:11
3	So a person of ordinary skill in the art would	13:29:16
4	consider, for example, the Internet, as we know	13:29:18
5	it, to be the public network.	13:29:22
6	Q What makes a network public as opposed to	13:29:28
7	private?	13:29:44
8	A Public network relies upon the shared	13:29:45
9	capabilities of infrastructure to send packets	13:29:53
10	from one point to another. And if you have a	13:29:57
11	service on the public side of a -- or the public	13:30:03
12	side of a public network, you have given others	13:30:08
13	the opportunity to access the services through a	13:30:14
14	public address, for example, a public IP address.	13:30:21
15	Private network, on the other hand, would	13:30:25
16	have private IP addresses that would not be known	13:30:29
17	to the outside world for access to the system.	13:30:31
18	Q Well, your response still uses the terms	13:30:34
19	"public" and "private" with respect to IP	13:30:48
20	addresses. So I think the question still remains.	13:30:50
21	What makes something public as opposed to	13:30:52
22	private, whether it be the network or an IP	13:30:55

1	address?	13:30:57
2	A Well, IP addresses are mapped, for	13:30:58
3	example, to -- the IP, the four addresses are	13:31:03
4	mapped to public domains and private domains.	13:31:09
5	So if I want to put up a private network,	13:31:13
6	I would have the ability to use a given address	13:31:17
7	range for my IP addresses. And others could use	13:31:21
8	the same private IP addresses, but that could not	13:31:24
9	be used for exposing something to the public side	13:31:28
10	of the Internet, for example, because, number one,	13:31:32
11	of the redundancy, and number two, the whole	13:31:38
12	purpose of providing those IP address mappings are	13:31:43
13	to prevent -- or to provide the opportunity for	13:31:45
14	private networks to utilize IP addresses over and	13:31:48
15	over if they wish.	13:31:51
16	And that redundancy would prohibit those	13:31:53
17	addresses from being able to be used on the public	13:31:57
18	network because there would be ambiguity	13:32:01
19	associated with those.	13:32:03
20	Public IP addresses, on the other hand,	13:32:04
21	are mapped and given out by a control organization	13:32:06
22	to entities to deploy their services or	13:32:09

1 capabilities or have access to the public network 13:32:12
2 via a public IP address. And that's a different 13:32:16
3 public IP -- I'm sorry -- that's a different IP 13:32:20
4 address range, and nobody else can use that IP 13:32:23
5 address based upon the organization that controls 13:32:29
6 the -- the assignment of IP addresses, for 13:32:33
7 example. 13:32:37

8 The IP addresses are just one example of 13:32:57
9 what makes something work with a public network 13:32:59
10 versus a private network. 13:33:04

11 Q So a public network is one that allows 13:33:05
12 access outside of the organization -- of the 13:33:36
13 network's organization? 13:33:43

14 Let me rephrase that. That was poorly -- 13:33:44
15 a poor question. 13:33:47

16 So as I understand, a public network, 13:33:49
17 then, allows for access by public IP address. 13:33:51

18 That's -- that's what makes a public 13:34:04
19 network, a public network? 13:34:06

20 ATTORNEY SCHREINER: Objection. Form. 13:34:08

21 A No, it's not the only thing that makes the 13:34:10
22 public network work. 13:34:14

1	The IP address is one element of that.	13:34:16
2	The -- as I mentioned when I first responded was	13:34:19
3	that it's a -- the public network is a shared	13:34:22
4	architecture. It's controlled by various	13:34:24
5	entities, but they come into agreements to work	13:34:27
6	with each other to interconnect their routers and	13:34:30
7	their switches so that they can pass the packets	13:34:35
8	from one point to another point. And they operate	13:34:38
9	within a given protocol structure that allows them	13:34:40
10	to do that packet passing.	13:34:49
11	And that's in contrast to a private	13:34:52
12	network, where you have a private network	13:34:55
13	administrator that's in control, for example, of	13:34:58
14	all the -- the switches and the routers within	13:35:02
15	your system. And you're not -- you're not relying	13:35:05
16	on multiple entities or various entities outside	13:35:08
17	of your control to pass your packets.	13:35:12
18	And nobody from the outside, for example,	13:35:14
19	should be able to get into the system --	13:35:19
20	obviously, there is security flaws involved -- but	13:35:22
21	get in the system if it's under private control.	13:35:24
22	That's the rough way to describe, at a	13:35:27

1 high level, the differentiation between a public 13:35:32
2 network and a private network. 13:35:34

3 Q So an organization's interim network would 13:35:36
4 be considered a private network? 13:35:41

5 A If it's not exposed to the outside, 13:35:42
6 meaning you can have, for example, my university 13:35:49
7 as a private network. And it also has elements 13:35:54
8 that are exposed to the public. And there is 13:35:57
9 structure within our network, as a total, 13:36:01
10 controlled by our university, that makes sure that 13:36:05
11 the public exposed elements of our network do not 13:36:09
12 permit people from the outside to come into our 13:36:11
13 private controlled parts of our network. 13:36:14

14 And so a single organization could have 13:36:16
15 elements that are sitting inside the public 13:36:19
16 network or that are part of the public network 13:36:21
17 that also have elements that are considered only 13:36:24
18 part of the private network. 13:36:27

19 Q Okay. Let's turn to Limitation 13.2. 13:36:36

20 Let me know when you're ready. 13:37:22

21 A Okay. I'm there. 13:37:25

22 Q So Limitation 13.2 recites, "Receiving a 13:37:26

1	set of video information at the video-editing	13:37:29
2	environment using the computer system."	13:37:32
3	Did I read that correctly?	13:37:34
4	A Yes.	13:37:35
5	Q What does it mean to receive a set of	13:37:42
6	video information?	13:37:44
7	A This claim element is saying that the	13:37:45
8	video-editing environment is receiving -- that is,	13:37:55
9	information coming in -- that information is with	13:37:59
10	respect to video. So it's labeled video	13:38:03
11	information.	13:38:05
12	Q And the video-editing environment receives	13:38:25
13	a set of video information in Limitation 13.2?	13:38:29
14	A It's being received at the video	13:38:37
15	environment. So that video information is being	13:38:39
16	delivered to the video-editing environment.	13:38:41
17	Q Are there any other requirements for the	13:38:57
18	video-editing environment in Limitation 13.2	13:38:58
19	besides receiving a set of video information?	13:39:02
20	A It's disclosing that you're using the	13:39:10
21	computer system that was disclosed in	13:39:13
22	Element 13.1.	13:39:17

1	set can be comprised of multiple elements, for	13:41:30
2	example, multiple segments of a video.	13:41:33
3	Q Okay. So let's move to Limitation 13.3.	13:41:52
4	Limitation 13.3 recites, "Receiving a set	13:42:07
5	of cue point information at the video-editing	13:42:11
6	environment using the computer system."	13:42:14
7	Did I read that correctly?	13:42:15
8	A Yes.	13:42:17
9	Q What does it mean to receive a set of cue	13:42:19
10	point information at the video-editing environment	13:42:28
11	using the computer system?	13:42:29
12	A To a person of ordinary skill in the art,	13:42:31
13	that indicates that one or more elements, the set,	13:42:36
14	associated with cue -- which are cue point	13:42:44
15	information, is being sent to the video-editing	13:42:47
16	environment using the disclosed computer system of	13:42:55
17	13.1.	13:42:58
18	Q So, in effect, cue point information is	13:43:01
19	delivered to the video-editing environment using a	13:43:11
20	computer system, and that video-editing	13:43:15
21	environment receives it?	13:43:20
22	ATTORNEY SCHREINER: Objection. Form.	13:43:22

1	A The information is arriving at the	13:43:24
2	video -- at the video-editing environment via the	13:43:27
3	computer system or using the computer system.	13:43:30
4	It's not saying anything specifically limiting	13:43:33
5	that to being directly by the video-editing	13:43:37
6	environment, for example, in terms of the	13:43:40
7	receiving element. It just says, "Receiving a set	13:43:42
8	of cue point information at the video-editing	13:43:45
9	environment using the computer system."	13:43:49

10	Q Does Limitation 13.3 impose any other	13:43:55
11	requirements as a -- as to the video-editing	13:43:59
12	environment, other than receiving a set of cue	13:44:02
13	point information using the computer system?	13:44:07

14	A From the perspective of a person of	13:44:10
15	ordinary skill in the art, no, there is no other	13:44:18
16	requirements there.	13:44:20

17	Q Do any of the other limitations of	13:44:30
18	Claim 13, other than Limitations 13.1, 13.2, and	13:44:35
19	13.3, refer to the video-editing environment?	13:44:41

20	A The video-editing environment is not	13:44:49
21	limited with respect to any of the other claim	13:45:39
22	elements -- sub elements of Claim 13.	13:45:41

1 Q And your reference to "any of the other
2 claim elements," you mean any remaining ones other
3 than 13.1 through 3?

13:45:50

13:45:54

13:45:58

4 A That is correct.

13:46:01

5 Q So Limitations 13.1, 13.2, and 13.3 are
6 the limitations within Claim 13 which define the
7 video-editing environment?

13:46:02

13:46:20

13:46:27

8 ATTORNEY SCHREINER: Objection. Form.

13:46:29

9 A Those elements, 13.1, 13.2, 13.3, disclose
10 aspects of the video-editing environment, but they
11 don't -- from the perspective of a POSITA, they're
12 not limiting the video-editing environment in any
13 other way.

13:46:40

13:46:46

13:46:51

13:46:55

13:46:57

14 So to answer your question is, it
15 certainly provides limitations, but it does not
16 provide any other exclusions beyond those
17 limitations.

13:46:57

13:47:00

13:47:07

13:47:10

18 ATTORNEY YAM: We've been about an hour.
19 Now is a good time for a break.

13:47:19

13:47:21

20 THE WITNESS: Five minutes?

13:47:24

21 ATTORNEY YAM: Let's do ten minutes.

13:47:25

22 THE WITNESS: Okay.

13:47:27

Transcript of Mark Mahon, Ph.D.
Conducted on March 13, 2025

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1	THE VIDEOGRAPHER: We are now going off	13:47:28
2	record. The time is 1:47 P.M.	13:47:30
3	(Recess.)	13:47:32
4	THE VIDEOGRAPHER: We are now back on	13:59:29
5	record. The time is 1:59 P.M.	13:59:35
6	BY ATTORNEY YAM:	13:59:40
7	Q Welcome back, Dr. Mahon.	13:59:40
8	A Thank you.	13:59:43
9	Q During the break, did you speak with	13:59:44
10	anyone regarding this case?	13:59:48
11	A I did not.	13:59:50
12	Q So prior to going on break, we were	13:59:51
13	discussing -- I believe we were at Limitation 13.1	13:59:58
14	of Claim 13, right?	14:00:03
15	A We went through 13.1 through 13.3.	14:00:05
16	Q Correct, yes.	14:00:08
17	So let's move forward to Limitation 13.4.	14:00:09
18	Let me know when you've got it up.	14:00:15
19	A I have it up.	14:00:16
20	Q Great.	14:00:17
21	So Limitation 13.4 recites, "Receiving a	14:00:18
22	cue point editing command over the network from a	14:00:22

1	remote client terminal disposed at a client side	14:00:25
2	of the public network using the computer system."	14:00:28
3	Did I read that correctly?	14:00:32
4	A Yes.	14:00:34
5	Q What does it mean to receive a cue point	14:00:41
6	editing command in Limitation 13.4?	14:00:48
7	A To a POSITA, that means that there is	14:00:51
8	command coming in, with regards to editing, which	14:01:02
9	is creating or modifying a cue point, and it's	14:01:08
10	received over the network. So that's coming over	14:01:14
11	the public network, and it's being received from a	14:01:19
12	client on the client side of the public network,	14:01:23
13	so -- and not from the server side. And it's	14:01:29
14	using the disclosed computer system, as we've	14:01:34
15	discussed, with respect to 13.1.	14:01:37
16	Q And the reference in Limitation 13.4 to	14:01:43
17	the client side of the public network, is that the	14:01:46
18	same understanding that we had discussed earlier	14:01:51
19	today as to what it means to be a client side	14:01:54
20	versus server side?	14:01:59
21	A Yes.	14:02:01
22	Q It doesn't mean anything different in the	14:02:01

1	context of Limitation 13.4?	14:02:03
2	A That's correct.	14:02:07
3	Q What does the term "remote client	14:02:17
4	terminal" mean in Limitation 13.4?	14:02:19
5	A In the parlance of client server	14:02:29
6	architecture, a POSITA would understand that a	14:02:31
7	remote client is not a client that is sitting	14:02:36
8	within the server architecture, for example.	14:02:42
9	Q And what does "client terminal" mean in	14:02:57
10	the context of Limitation 13.4?	14:03:00
11	A Any device that would permit the user to	14:03:02
12	access the services.	14:03:09
13	Q The services on the server side?	14:03:14
14	A Correct.	14:03:19
15	Q Does Limitation 13.4 impose any	14:04:19
16	limitations on how the remote client terminal	14:04:22
17	sends the cue point editing command, other than it	14:04:27
18	being over the public network?	14:04:31
19	A As far as receiving is concerned, it's not	14:04:33
20	providing any additional elements other than as	14:04:47
21	you stated; although, it also encompasses that it	14:04:52
22	must be coming from the remote client on the	14:04:55

1	public side of the network, and is received using	14:04:59
2	the computer system.	14:05:04
3	Q So other than the command being received	14:05:11
4	over the public network and using the computer	14:05:15
5	system, there is no requirement -- further	14:05:20
6	requirements attached to how it's received from a	14:05:25
7	remote client terminal in Limitation 13.4?	14:05:28
8	A There is no other limitations associated	14:05:31
9	with Element 13.4.	14:05:44
10	Q Moving to Limitation 13.5.	14:05:54
11	Limitation 13.5 recites, "Modifying a	14:05:58
12	portion of the cue point information at the server	14:06:00
13	side of the public network according to the cue	14:06:03
14	point editing command received over the public	14:06:07
15	network from the client terminal."	14:06:10
16	Did I read that correctly?	14:06:13
17	A Yes, you did.	14:06:14
18	Q That was quite a lengthy limitation.	14:06:19
19	Let's unpack this a bit. Let's start with the	14:06:22
20	easy one.	14:06:27
21	The reference to "the server side of the	14:06:28
22	public network." Is this the same server side	14:06:31

1	that's referenced in Limitation 13.1?	14:06:34
2	A Yes.	14:06:39
3	Q And the term "server side of the network"	14:06:50
4	is -- we had talked about this concept earlier	14:06:55
5	today, correct?	14:06:57
6	A Correct.	14:06:58
7	Q And your testimony regarding what it means	14:07:03
8	to be on the server side earlier today would	14:07:05
9	likewise apply here to Limitation 13.5?	14:07:09
10	A Yes.	14:07:12
11	Q What does it mean to modify a portion of	14:07:18
12	the cue point information?	14:07:40
13	A The specification with respect to	14:07:41
14	modifying gives a -- has a discussion in Column 21	14:08:51
15	at lines 13 through 19, with respect to cue point	14:08:59
16	information, which says, "It may include such	14:09:06
17	cases as changing various attributes of an	14:09:11
18	existing cue point. Example, the cue point --	14:09:13
19	point's name or time position, changing the	14:09:18
20	associations between an existing cue point and	14:09:25
21	either a video file or other cue point information	14:09:27
22	or any other useful type of modification to	14:09:30

1	existing cue point information."	14:09:33
2	And that is consistent with the	14:09:36
3	understanding of a POSITA.	14:09:37
4	Q And the description in Column 21, lines 13	14:09:48
5	through 19 of the '286 patent, that would apply to	14:09:53
6	the modifying language in Limitation 13.5?	14:10:01
7	A It would be consistent with the	14:10:13
8	understanding of a POSITA's -- well, a POSITA's	14:10:15
9	understanding of what modifying's ordinary --	14:10:19
10	plain and ordinary meaning is, so, yes.	14:10:24
11	Q And the reference in Limitation 13.5 to	14:10:27
12	"the cue point editing command received over the	14:10:38
13	public network from the client terminal," is that	14:10:40
14	language just a reference to the cue point editing	14:10:45
15	command as recited in the prior limitation,	14:10:48
16	Limitation 13.4?	14:10:52
17	A Yes, it is.	14:10:53
18	Q Are there any other requirements for --	14:10:58
19	strike that.	14:10:58
20	Does Limitation 13.5 impose any	14:11:36
21	requirements as to how a portion of the cue point	14:11:39
22	information is modified?	14:11:46

1	A Well, it says that it has to occur on the	14:11:55
2	server side, and according to the cue point	14:12:01
3	editing command received.	14:12:04
4	Q So beyond language that is recited in	14:12:11
5	13.5, are there any further requirements as to how	14:12:16
6	a portion of the cue point information is to be	14:12:21
7	modified to satisfy Limitation 13.5?	14:12:25
8	A No.	14:12:43
9	Q Moving to Limitation 13.6.	14:12:44
10	Limitation 13.6 recites, "Receiving a cue	14:12:51
11	point selection over the network from the remote	14:12:58
12	client terminal, identifying one of the cue points	14:13:02
13	corresponding to a portion of the video	14:13:04
14	information of one of the video files; and."	14:13:06
15	Did I read Limitation 13.6 correctly?	14:13:15
16	A Yes.	14:13:18
17	Q What does it mean to receive a cue point	14:13:23
18	selection in Limitation 13.6?	14:13:26
19	A 13.6 is disclosing that the remote client	14:13:31
20	is sending a cue point selection to the system.	14:13:41
21	So it's originating from the remote client. And	14:13:51
22	that cue point selection is identifying one of the	14:13:54

1 cue points, and that cue point -- those cue points 14:13:58
2 correspond to a portion of the video information 14:14:03
3 of one of the video files. So the receiving is 14:14:06
4 tied into all of that claim language. 14:14:12

5 Q Where in Limitation 13.6 is there a 14:14:15
6 requirement that a system is receiving a cue point 14:14:26
7 selection? 14:14:30

8 A Well, that Claim Limitation language does 14:14:48
9 not use the word "system." So if I included the 14:15:10
10 word "system" in my answer, that is not a -- as 14:15:13
11 part of that claim language. 14:15:17

12 Q Understood. 14:15:21

13 What does it mean, in Limitation 13.6, to 14:16:11
14 identify one of the cue points? 14:16:13

15 Or let me -- let me clarify. 14:16:21

16 What does it mean, in Limitation 13.6, 14:16:21
17 that a cue point selection identifies one of the 14:16:24
18 cue points? 14:16:27

19 A To a person of ordinary skill in the art, 14:16:31
20 cue point selection is referring to the action at 14:17:27
21 the remote client, the -- where the remote client 14:17:38
22 is identifying one of the cue points corresponding 14:17:41

1 to a portion of a video information.

14:17:45

2 So that cue point selection would be
3 associated with that corresponding portion of the
4 video information.

14:17:48

14:17:51

14:17:54

5 Q You said that the cue point selection is
6 referring to the action at the remote client.

14:18:44

14:18:45

7 What do you mean by "the action at the
8 remote client"?

14:18:52

14:18:54

9 A The claim language says you're receiving a
10 cue point selection. And the ordinary meaning of
11 "selection" is to pick, that is, an action. And
12 that is associated with -- as far as this claim
13 element is concerned, with the remote client
14 terminal identifying one of the cue points, and
15 that cue point is corresponding to a portion of
16 the video information.

14:19:04

14:19:08

14:19:14

14:19:19

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17 So that's what I was trying to articulate.

14:19:38

18 Q Let's move to Limitation 13.7.

14:20:04

19 A 13.7. Okay.

14:20:28

20 Q So this limitation reads, "Streaming the
21 portion of the video information to the client
22 terminal over the public network in response to

14:20:29

14:20:37

14:20:39

1	receiving the cue point selection."	14:20:42
2	Did I read that correctly?	14:20:45
3	A Yes.	14:20:47
4	Q What does it mean to "stream" the portion	14:20:52
5	of the video information?	14:20:55
6	A A POSITA would understand that "streaming"	14:20:56
7	is to send a sequence of video segments, for	14:21:04
8	example. So what this is saying is, you're	14:21:11
9	receiving a stream of video information that	14:21:15
10	corresponds to the portion that was discussed or	14:21:20
11	disclosed in 13.6.	14:21:25
12	Q You just said "you" are receiving a stream	14:21:30
13	of video information.	14:21:38
14	Is "you" referring to the client terminal?	14:21:39
15	A Yes. That's what I was trying to say.	14:21:42
16	In this context of limitation, a POSITA	14:21:46
17	would understand that the streaming is to the	14:21:51
18	client, and that streaming is referring to	14:21:53
19	receiving multiple segments in a row of video	14:21:57
20	information.	14:22:01
21	Q So earlier today when we were discussing	14:22:34
22	various functionalities of the VEE, I believe you	14:22:40

1 mentioned that one -- one functionality that could
2 be provided is the VEE delivering video player
3 capability to the client.

14:22:43

14:22:47

14:22:51

4 Do you recall that?

14:22:53

5 ATTORNEY SCHREINER: Objection. Form.

14:22:58

6 A What I said earlier was, with respect to
7 the disclosure, that the VEE may also comprise or
8 include a video player.

14:23:02

14:23:52

14:23:56

9 So with respect to that context, that's
10 what I was referring to.

14:23:58

14:24:01

11 Q So in Limitation 13.7, is it the client
12 terminal that's viewing the streamed video
13 information, or is it the server that's viewing
14 this streamed information?

14:24:13

14:24:19

14:24:24

14:24:28

15 ATTORNEY SCHREINER: Objection. Form.

14:24:33

16 A Well, the limitation itself, it says that
17 it's streaming the portion of the video
18 information to the client terminal over the public
19 network. It's not saying what path it has to
20 follow. It's saying that the streaming is
21 happening, and it's being sent to the client
22 terminal over the public network.

14:24:43

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14:24:58

14:25:02

1	Q And Limitation 13.7 does not impose any	14:25:19
2	requirement as to any specific component that has	14:25:37
3	to perform the streaming; is that correct?	14:25:39
4	A 13.7 only discloses that the streaming is	14:25:43
5	being sent to the client. It does not provide any	14:26:11
6	other restrictions.	14:26:14
7	Q Circle back to Limitation 13.4.	14:26:23
8	And as we discussed earlier,	14:26:26
9	Limitation 13.4 recites a cue point editing	14:26:31
10	command, correct?	14:26:35
11	A That is correct.	14:26:36
12	Q What does the word "command" mean in the	14:26:41
13	context of Limitation 13.4?	14:26:44
14	A To a POSITA, given the disclosures --	14:27:03
15	disclosure of the system and the specification	14:27:07
16	itself and the language here in Claim	14:27:10
17	Element 13.4, the command would be understood by	14:27:14
18	that POSITA as a message requiring the system to	14:27:19
19	perform a given act, for example.	14:27:27
20	Q Does Limitation 13.4 impose any	14:27:43
21	limitations on how that message would be	14:27:48
22	structured or formatted?	14:27:55

1	A	It doesn't -- does not put a requirement	14:27:58
2		on the format for that command, just that it's a	14:28:04
3		command.	14:28:07
4	Q	So moving forward, again, to	14:28:22
5		Limitation 13.6.	14:28:24
6		13.6 recites a cue point selection, and we	14:28:34
7		discussed that recently, correct?	14:28:39
8	A	Right.	14:28:44
9	Q	And you referred to the terms	14:28:44
10		"selection" -- the word "selection" as equating it	14:28:53
11		to picking.	14:28:57
12		Do you recall that? Or pick?	14:28:59
13	A	Yes -- yes, I do.	14:29:01
14	Q	Does Limitation 13.6 impose any other	14:29:04
15		restrictions on what it means to be a selection?	14:29:06
16	A	What I was articulating previously was	14:29:11
17		that a person of ordinary skill in the art would	14:29:17
18		understand a selection to be a choosing among	14:29:20
19		possibilities, such as picking.	14:29:24
20		Within Element 13.6, there is no other	14:29:28
21		limitations associated with that word "selection"	14:29:35
22		in the interpretation of a POSITA, other than it	14:29:39

1	says that it's identifying one of the cue points	14:29:44
2	corresponding to a portion of the video	14:29:48
3	information of one of the video files.	14:29:49
4	Q So Limitation 13.6 does not impose any	14:29:54
5	limitations on how the recited selection is	14:29:57
6	structured or formatted, then?	14:30:00
7	A Not -- no, not specifically.	14:30:02
8	Q One moment.	14:30:46
9	So focusing still on Limitation 13.6 and	14:32:16
10	the recitation of receiving a cue point selection	14:32:23
11	over the network from the remote client terminal.	14:32:26
12	Does this receiving act encompass	14:32:36
13	receiving the selection based on a web browser of	14:32:40
14	the remote client terminals sending the selection?	14:32:48
15	A Can you ask that question again, please?	14:32:56
16	Q Sure.	14:32:58
17	Does the language in Limitation 13.6 of	14:33:00
18	receiving a cue point selection over the network	14:33:03
19	from the remote client terminal include a web	14:33:06
20	browser of the remote client terminal sending the	14:33:11
21	cue point selection such that it is received?	14:33:14
22	ATTORNEY SCHREINER: Objection. Form.	14:33:21

1 A So there is no limitation that says
2 that -- for example, that it must be a web
3 browser. And if it is a web browser, you'd have
4 to structure or tell me something about the web
5 browser that would allow -- in the context of the
6 use case, that would allow the quote-unquote web
7 browser to send the command.

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14:33:42

14:33:44

8 Q Well, let me ask it differently, then.

14:33:49

9 Is there any language in 13.6 that
10 precludes the use of a web browser at the remote
11 client terminal from sending a cue point selection
12 such that it's received?

14:33:53

14:33:56

14:33:59

14:34:02

13 ATTORNEY SCHREINER: Objection. Form.

14:34:07

14 A So a POSITA would understand that the
15 language in 13.6 is saying what has to occur.
16 It's not putting a requirement on how that is
17 being generated. As long as it meets all the
18 other elements with respect to the disclosed
19 invention, it could fall under that, but we'd have
20 to discuss the particulars of the implementation
21 to say whether it falls under the disclosures of
22 the invention.

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14:34:51

14:34:54

1 Q So, then, the answer is, no, there is no 14:34:57
2 language in 13.6 that precludes the use of a web 14:35:05
3 browser at the remote client terminal from sending 14:35:08
4 a cue point selection such that it's received? 14:35:11

5 A As we discussed earlier today, the browser 14:35:13
6 is an environment, an application that you run. 14:35:28
7 Depends upon the capability of the browser. It 14:35:30
8 depends upon how the system is deployed. 14:35:33

9 But there is nothing in 13.6 speaking or 14:35:34
10 limiting how that can be implemented, as long as 14:35:37
11 it's meeting the claim language. 14:35:41

12 Q So would a POSITA understand that there 14:35:43
13 is -- that one approach to deploying 14:37:48
14 Limitation 13.6 is using a browser? 14:37:55

15 ATTORNEY SCHREINER: Objection. Form. 14:38:02
16 Scope. 14:38:03

17 A That statement is too high and ambiguous 14:38:08
18 to be able to answer -- that question, I should 14:38:11
19 say -- because you have to give specifics. 14:38:15

20 The term "web browser" encompasses a 14:38:17
21 zillion different implementations. 14:38:20

22 Q Is there any implementation involving a 14:38:26

1	web browser that would satisfy Limitation 13.6?	14:38:29
2	ATTORNEY SCHREINER: Objection. Form.	14:38:35
3	Scope.	14:38:35
4	A Yeah, I don't want to speculate as far as	14:38:36
5	the design requirements for a given system. There	14:38:38
6	is -- it's up to the -- again, the engineers to	14:38:41
7	design the system to work properly as disclosed	14:38:44
8	within respect to the patent.	14:38:50
9	And, you know, within that scope, you can	14:38:51
10	write software, whether it's a -- in a browser	14:38:52
11	environment or in a browser -- quote-unquote	14:38:55
12	browser application or not. That's up to the	14:38:58
13	software engineers to design.	14:39:02
14	Q What if a designer was using a standard	14:39:05
15	web browser to implement Limitation 13.6?	14:39:08
16	ATTORNEY SCHREINER: Objection. Form.	14:39:16
17	A Again, you're speculating about the	14:39:17
18	particular types of components that would be --	14:39:19
19	have to be included in the -- to implement the	14:39:21
20	disclosed system.	14:39:24
21	Just saying the term "web browser" doesn't	14:39:25
22	make it a possibility. It's kind of similar to	14:39:27

1 saying, essentially, is the person really going to 14:39:31
2 be able to to do it. Well, it's -- that's a large 14:39:36
3 scope. It's... 14:39:39

4 So you have to have particular elements as 14:39:40
5 disclosed in the claim language. And, again, if 14:39:44
6 it meets the claim language, then it's covered 14:39:49
7 under the -- the invention disclosure. 14:39:52

8 Q So sitting here today, you can't opine one 14:40:08
9 way or the other whether it's possible to 14:40:11
10 implement Limitation 13.6 using a web browser on 14:40:15
11 the claim? 14:40:20

12 ATTORNEY SCHREINER: Same objection. 14:40:21

13 A Again, it depends upon what the actual 14:40:22
14 implementation is. 14:40:23

15 If you're saying that they're adhering to 14:40:25
16 every element of the claims as disclosed in the 14:40:27
17 '286 patent, then it's possible. 14:40:31

18 Q What's possible? 14:40:39

19 A To implement the disclosures in the '286. 14:40:42

20 Q Using a web browser? 14:40:48

21 ATTORNEY SCHREINER: Objection. Form. 14:40:51

22 A Again, writing an application, which you 14:40:52

1 can call it a web browser, but as long as the 14:40:57
2 system that you're deploying meets the limitation 14:41:00
3 language, then it's possible, under this -- under 14:41:03
4 that scenario. 14:41:07

5 Q Okay. In Limitation 13.6, is there any 14:41:11
6 requirement as to how the remote client terminal 14:42:07
7 provides the cue point selection that's received? 14:42:09

8 ATTORNEY SCHREINER: Objection. Asked and 14:42:15
9 answered. 14:42:17

10 A Beyond what we've already discussed, I 14:42:23
11 don't -- I can't recall anything else to bring up 14:42:37
12 with respect to that question. 14:42:41

13 Q And moving back to Limitation 13.4, which 14:42:48
14 recites, "Receiving a cue point editing command 14:42:53
15 from a remote client terminal," is there any 14:42:55
16 requirement in Limitation 13.4 as to how the 14:43:01
17 remote client terminal provides the cue point 14:43:03
18 editing command? 14:43:06

19 ATTORNEY SCHREINER: Objection. Form. 14:43:09

20 A Could you ask the question again, please? 14:43:11

21 Q Sure. 14:43:33

22 In Limitation 13.4, which recites, 14:43:38

1 "Receiving a cue point editing command from the 14:43:41
2 remote client terminal," is there any requirement 14:43:43
3 in this limitation as to how the remote client 14:43:46
4 terminal provides the cue point editing command? 14:43:49

5 ATTORNEY SCHREINER: Objection. Form. 14:43:54

6 A 13.4 only references that the -- the -- 14:44:09
7 your system is receiving a cue point editing 14:44:27
8 command. It's not addressing, in 13.4, the 14:44:29
9 generation or structure of a command, just that it 14:44:36
10 is a -- you're receiving a cue point editing 14:44:41
11 command from the remote client terminal. 14:44:43

12 So, obviously, it's talking about the 14:44:47
13 client side of the network where that command is 14:44:49
14 coming from. 14:44:51

15 But other than that, the Claim Limitation 14:44:52
16 language speaks for itself, as far as a person of 14:44:55
17 ordinary skill in the art is concerned. 14:44:59

18 Q I'd like to shift gears and return back to 14:45:11
19 the '286 patent, Exhibit 1001. 14:45:13

20 Let me know when you've got it open. 14:45:19

21 A I have it open. 14:45:20

22 Q Let's turn to Figure 6. 14:45:21

1	A One second, please.	14:45:26
2	Q Sure.	14:45:27
3	A Let me see if I can just rotate this on --	14:45:38
4	there it goes.	14:45:41
5	All right. I am there.	14:45:44
6	Q Are you familiar with Figure 6 of the '286	14:45:47
7	patent?	14:45:50
8	A Yes.	14:45:50
9	Q What is being depicted in Figure 6 of the	14:46:03
10	'286 patent?	14:46:09
11	A Well, the specification discloses that	14:46:10
12	Figure 6 is an exemplary screenshot of an	14:46:43
13	embodiment of the video-editing environment as	14:46:46
14	viewed by a client terminal according to the	14:46:50
15	invention.	14:46:54
16	Q And are you referencing a particular	14:46:57
17	column line range?	14:47:01
18	A Yes, Column 25 and it begins at line 64,	14:47:02
19	and goes to 66, specifically is what I stated.	14:47:09
20	Q So is it fair to characterize Figure 6 as	14:47:28
21	an exemplary screenshot of a VEE user interface?	14:47:30
22	A Yes.	14:47:35

1	ATTORNEY SCHREINER: Object to form.	14:47:43
2	Object to form.	14:47:45
3	Q Where is this screenshot of -- Figure 6 of	14:47:49
4	the '286 patent, where is this screenshot being	14:47:59
5	displayed?	14:48:01
6	A Well, it says it's "as viewed by a client	14:48:03
7	terminal." So a POSITA would understand that that	14:48:14
8	screenshot is being viewed at the client terminal.	14:48:17
9	Q It's being displayed at a display screen	14:48:26
10	of the client terminal?	14:48:28
11	A It's video, so I don't know of any other	14:48:31
12	type of display that would enable the -- person at	14:48:35
13	the client terminal to be able to view it. So	14:48:41
14	that would be logical, yes.	14:48:44
15	Q So yes, it's being displayed at the	14:48:49
16	display screen at the user terminal, Figure 6?	14:48:52
17	A That would be the implication, yes.	14:48:56
18	Q So this screenshot, Figure 6 of the '286	14:49:13
19	patent is being displayed on the client side of	14:49:16
20	the system, correct?	14:49:20
21	A Correct.	14:49:25
22	Q And it's being displayed to a user of the	14:49:33

1	client terminal?	14:49:36
2	A Yes.	14:49:58
3	Q Is there a component of the client	14:49:59
4	terminal that provides for the display of this	14:50:12
5	screenshot?	14:50:17
6	ATTORNEY SCHREINER: Objection. Form.	14:50:21
7	A Would you ask the question again, please?	14:50:23
8	Q Sure. Is there a component of the client	14:51:10
9	terminal that provides for the display of the	14:51:12
10	screenshot?	14:51:15
11	ATTORNEY SCHREINER: Objection. Form.	14:51:16
12	A I'm not sure what you mean by "a	14:51:18
13	component," but the -- in column 26, the inventor	14:51:34
14	says specifically that "the cue point editor	14:51:39
15	screen 600 is illustrated in Figure 6 for	14:51:44
16	illustrative purposes only and should not be	14:51:47
17	construed to limit the scope of the invention."	14:51:50
18	With respect to the disclosures, and then	14:51:53
19	what's shown in Figure 6 as far as it being a	14:51:57
20	screenshot, a person of ordinary skill in the art	14:52:00
21	would understand that a screenshot would be taken	14:52:04
22	from a screen, if that's the question you're	14:52:09

1 asking.

14:52:13

2 Q Are there any other components of the
3 client terminal besides the screen that are
4 involved in presenting the screenshot, this
5 exemplary screenshot?

14:52:14

14:52:20

14:52:22

14:52:26

6 ATTORNEY SCHREINER: Objection. Form.

14:52:27

7 A Yeah, I'm not sure what you mean by that.
8 What does that question encompass?

14:52:29

14:52:31

9 Q Well, let's step back.

14:52:36

10 Let's say I walk into a Best Buy and I buy
11 a Dell laptop and I flip it on. Am I going to see
12 the screen in Figure 6?

14:52:37

14:52:40

14:52:44

13 A Unless it happens to be engaged in the
14 system that's being disclosed in the patents, most
15 likely not.

14:52:46

14:52:54

14:52:57

16 Q So what steps are involved in that new --
17 brand new Dell laptop so as to get to the point
18 where the user is seeing the screenshot in
19 Figure 6?

14:53:00

14:53:04

14:53:08

14:53:11

20 ATTORNEY SCHREINER: Objection. Form.
21 Scope.

14:53:13

14:53:14

22 A I'm not sure exactly the question you're

14:53:18

1 asking with respect to my response to the -- the 14:53:21
2 challenges to the claims. If you can point me to 14:53:31
3 a specific claim element and claim, I can -- 14:53:34
4 within this context, I can discuss it within that 14:53:37
5 context. 14:53:41

6 Q Well, I'm just generally -- Figure 6 is 14:53:43
7 described as a screenshot, correct? 14:53:47

8 A This specification does say screenshot, 14:53:52
9 yes. 14:53:54

10 Q So I'm trying to gather your understanding 14:53:54
11 of how -- how we get to the point of this 14:54:01
12 screenshot. 14:54:05

13 ATTORNEY SCHREINER: Objection. Scope. 14:54:07

14 A A POSITA would understand this is -- this 14:54:08
15 figure and its description are designed to inform 14:54:17
16 the POSITA reading the patent about the disclosure 14:54:21
17 of the invention. And the four corners of the 14:54:29
18 spec as well as the challenged claims lay out how 14:54:33
19 that process must work as part of the invention. 14:54:37

20 Q So would the owner of that brand new 14:54:46
21 laptop need to install any software to arrive at 14:54:53
22 the screenshot of Figure 6? 14:54:57

Transcript of Mark Mahon, Ph.D.
Conducted on March 13, 2025

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1	ATTORNEY SCHREINER: Objection. Scope.	14:54:58
2	A Yeah, I don't want to go into speculation	14:54:59
3	about a particular laptop. There has to be -- you	14:55:02
4	have to provide exactly what's loaded, what's not	14:55:05
5	loaded; what, as part of the invention is actually	14:55:09
6	being implemented, what isn't -- to answer that	14:55:12
7	question.	14:55:16
8	Q Okay. All right. Let's focus on some	14:55:17
9	aspects of Figure 6.	14:55:20
10	ATTORNEY SCHREINER: Stephen, are we	14:56:02
11	getting close to a convenient time for a break in	14:56:03
12	your questioning so the witness can take a break?	14:56:06
13	ATTORNEY YAM: Sure. We can take a break	14:56:07
14	right now. It's probably a good stopping point.	14:56:09
15	THE VIDEOGRAPHER: We are now going off	14:56:12
16	the record. The time is 2:56 P.M.	14:56:13
17	(Recess.)	14:56:17
18	THE VIDEOGRAPHER: We are now become on	15:08:08
19	the record. The time is 3:08 P.M.	15:08:10
20	BY ATTORNEY YAM:	15:08:12
21	Q Welcome back, Dr. Mahon.	15:08:12
22	A Thank you.	15:08:16

1	Q During the break, did you speak with	15:08:17
2	anyone regarding this case?	15:08:20
3	A I did not.	15:08:21
4	Q All right. Turn back to Figure 6.	15:08:24
5	A Figure 6, going back there.	15:08:26
6	Q Do you have it in front of you?	15:08:40
7	A Yes, I do.	15:08:42
8	Q Okay. Great.	15:08:42
9	How does a user edit a cue point using the	15:08:48
10	user interface shown in Figure 6?	15:08:51
11	A The user would utilize the cue point tools	15:09:26
12	as far as this example is concerned for editing a	15:09:34
13	cue point.	15:09:38
14	Q So to give one example, could a user	15:09:45
15	change the name of cue point in this Figure 6	15:09:52
16	screenshot?	15:09:56
17	ATTORNEY SCHREINER: Objection. Scope.	15:10:03
18	A You're asking me with respect to any	15:10:04
19	particular claim elements or any particular in my	15:10:38
20	declaration, or are you just asking me in general	15:10:43
21	to discuss what's disclosed in the specification?	15:10:44
22	Q I'd like to understand how your -- how a	15:10:48

1	POSITA would interpret Figure 6, would understand	15:10:56
2	Figure 6? Would a POSITA understand Figure 6,	15:10:58
3	that screenshot to provide functionality for a	15:11:00
4	user to edit or type in a cue point's name?	15:11:05
5	ATTORNEY SCHREINER: Objection. Scope.	15:11:12
6	A Well, what I'm trying to understand about	15:11:18
7	the question is how does that relate to my	15:11:19
8	responsive declaration in this case?	15:11:21
9	Q Well, you relied on Figure 6 in describing	15:11:25
10	the '286 patent, don't you --	15:11:29
11	ATTORNEY SCHREINER: Object to form.	15:11:31
12	Q -- at paragraph 63 of your declaration.	15:11:45
13	A Yes, in paragraph 63, I am using, as I did	15:12:08
14	in Figure 1A, to discuss the disclosures within	15:12:14
15	the patent specification itself. And I do point	15:12:18
16	to Figure 6 here and I call out the various	15:12:21
17	elements associated with Figure 6 as presented in	15:12:24
18	the '286.	15:12:29
19	Q And you describe that this user interface	15:12:30
20	shown in Figure 6 allows the client side user to	15:12:33
21	do various functions including insert new cue	15:12:37
22	points and modify existing cue points.	15:12:41

1	Do you see that?	15:12:42
2	A Yes, I do.	15:12:43
3	Q So is changing the name of a cue point one	15:12:55
4	example of modifying an existing cue point in the	15:12:59
5	context of Figure 6?	15:13:01
6	ATTORNEY SCHREINER: Objection. Scope?	15:13:04
7	A Well, with respect to the -- that section	15:13:14
8	in my declaration discussing the presentation of	15:13:18
9	the Figure 6 in the '286 patent, the '286 patent	15:13:21
10	discloses that that area 2630 comprises something	15:13:28
11	such as a cue point field name where you can enter	15:13:36
12	a cue point name, if that's what you're referring	15:13:39
13	to.	15:13:41
14	So it's disclosing that you could put a	15:13:42
15	name in there.	15:13:45
16	Q In the field that's labeled as 632, you	15:13:52
17	mean?	15:13:56
18	A I -- yes, under the section that's labeled	15:13:56
19	630, yes. I believe it's 630. It's a little	15:13:59
20	bit -- let me blow it up here. Sorry.	15:14:06
21	Yes, in the specification it refers to	15:14:13
22	that, "insert cue point parameters as 630."	15:14:15

1 Q And in this element 630, there are also 15:14:22
2 two buttons, one that's labeled cancel, and 15:14:25
3 another one that's labeled save towards the lower 15:14:28
4 right-hand corner. 15:14:30

5 Do you see that? 15:14:31

6 A I see that in the -- let me just check on 15:14:32
7 that bounding box. The Figure 6. I certainly see 15:14:40
8 the save and cancel button and I see that arrow, 15:15:11
9 correct, yeah, that seems to be within 630. 15:15:17

10 Q What is the function of the cancel button? 15:15:21

11 ATTORNEY SCHREINER: Objection. Scope. 15:15:34

12 A Well, as disclosed with respect to 15:15:56
13 Figure 6 and the patent specification discussing 15:15:59
14 Figure 6, the cancel button is labeled as -- or 15:16:05
15 disclosed as allowing a client to cancel the 15:16:11
16 current point cue point editing. 15:16:13

17 Q What does it mean "to cancel the current 15:16:22
18 cue point editing"? 15:16:24

19 A Are you saying from the perspective of a 15:16:28
20 person of ordinary skill in the art? 15:16:30

21 Q Yes. 15:16:34

22 A Well, when you cancel something, you're 15:16:37

1 stopping the process of whatever you're in the 15:16:40
2 current state of executing. 15:16:41

3 Q And what is the function of the save 15:16:52
4 button in Figure 6? 15:16:54

5 ATTORNEY SCHREINER: Objection. Scope. 15:16:56

6 A Within the patent specification discussing 15:17:07
7 Figure 6, it says that the save button is for 15:17:10
8 allowing a client to save the current cue point 15:17:16
9 editing and possibly submit the cue point 15:17:18
10 information. 15:17:22

11 Q Are you referring to a particular column 15:17:25
12 and line range? 15:17:28

13 A Yes, I've been looking at column 27 and 15:17:29
14 that is -- that I just read from is lines 55 15:17:35
15 through 57. 15:17:38

16 Q And that reference to submitting the cue 15:17:40
17 point information, does that mean submitting it to 15:17:50
18 the server side? 15:17:54

19 ATTORNEY SCHREINER: Objection. Scope. 15:17:57

20 A So with respect to the -- our disclosure 15:17:58
21 here in the specification, it just states that 15:18:04
22 you're submitting it. With respect to the claim 15:18:08

1 elements, then, you would -- with respect to the 15:18:13
2 limitations, claim element limitations we can 15:18:15
3 discuss any particular limitation, but the action 15:18:18
4 of submitting is part of the process of doing the 15:18:22
5 editing. So it would -- you would have to just 15:18:26
6 further investigate exactly what part of the claim 15:18:32
7 element you're looking at and examining to see if 15:18:35
8 it would adhere to the particular claim element 15:18:37
9 that we would like to evaluate. 15:18:41

10 Q Okay. Do you have an opinion as to 15:18:42
11 whether Figure 6 of the '286 patent is covered by 15:19:09
12 Claim 13? 15:19:15

13 ATTORNEY SCHREINER: Objection. Scope. 15:19:20

14 A It's referring -- 15:19:22

15 ATTORNEY SCHREINER: Objection. Legal 15:19:23
16 conclusion. 15:19:24

17 A Referring back to our discussion about 15:19:25
18 Figure 1A, I would have the same answer with 15:19:27
19 respect to this figure. It's an exemplary -- it's 15:19:30
20 a screenshot of an exemplary implementation of the 15:19:34
21 client side. We'd have to go through, again, a 15:19:40
22 particular implementation to see if it's meeting 15:19:45

1 the claim language and then whether the 15:19:50
2 implementation is matching the figure. And it's 15:19:53
3 not an evaluation I performed. I -- I evaluated 15:19:58
4 the challenged claims in light of claim language 15:20:02
5 and used the patent specification to understand 15:20:07
6 the -- how the invention was disclosed and 15:20:11
7 Figure 6 was part of that. 15:20:14

8 Q Does Figure 6 show a cue point editing 15:20:16
9 command as recited in Limitation 13.4? 15:20:25

10 ATTORNEY SCHREINER: Objection. Scope. 15:20:28

11 A I didn't make that assertion in my 15:20:30
12 declaration. If you could point to me where 15:20:33
13 you're talking about in my declaration. 15:20:36

14 Q Well, you understand that Limitation 13.4 15:20:40
15 recites a cue point editing command, correct? 15:20:43

16 A Yes. 15:20:47

17 Q And we had spoken earlier today regarding 15:20:48
18 what that term means, correct? 15:20:50

19 A Correct. 15:20:53

20 Q Do you see anything in Figure 6 that 15:20:55
21 represents a cue point editing command? 15:20:58

22 ATTORNEY SCHREINER: Objection. Scope. 15:21:01

1 A Yeah, I don't understand the question. A 15:21:02
2 command versus a picture of a system and as part 15:21:04
3 of an exemplary for -- showing what the UIM looks 15:21:08
4 like to the client, how -- I guess I just don't 15:21:15
5 understand the question. 15:21:18

6 Q So you can't say whether the save button 15:21:26
7 shown in Figure 6 of the '286 patent would cause a 15:21:29
8 cue point editing command to be detected? 15:21:32

9 ATTORNEY SCHREINER: Objection. Sorry, 15:21:35
10 objection. Scope. 15:21:40

11 A Again, if you provide context, details, I 15:21:40
12 can answer that question, but you're basically 15:21:43
13 providing a high-level question without details 15:21:46
14 without reference to my declaration that I can 15:21:52
15 answer. 15:21:54

16 ATTORNEY YAM: All right. Let's shift 15:22:18
17 gears. 15:22:19

18 I'm introducing into the chat an exhibit 15:22:21
19 that has already been marked as Exhibit 1004, and 15:22:44
20 is U.S. Patent Publication Number 2005-0081159. 15:22:50

21 (Exhibit 1004, marked for identification.) 15:23:02

22 Q Dr. Mahon, let me know when you've got 15:23:02

1	that up.	15:23:05
2	A Okay. I have that open.	15:23:13
3	Q Are you familiar with this exhibit,	15:23:15
4	Exhibit 1004?	15:23:17
5	A Yes, this is the Gupta reference that's --	15:23:18
6	was submitted as part of the petition in the	15:23:26
7	declaration, the expert's declaration as part of	15:23:28
8	the IPR.	15:23:31
9	Q And for discussion purposes today, we can	15:23:33
10	refer to this document as Gupta or the Gupta	15:23:37
11	reference. Does that sound good?	15:23:41
12	A Yes.	15:23:43
13	Q Great. Turn to Figure 1 of Gupta.	15:23:44
14	A One second, please.	15:24:03
15	Q Sure.	15:24:04
16	A Okay.	15:24:09
17	Q Figure 1 of Gupta depicts a system	15:24:12
18	involving servers, clients, and a network; fair to	15:24:16
19	say?	15:24:21
20	A Figure 1 of Gupta does present clients, a	15:24:22
21	network, and various servers, as well as data	15:24:57
22	stores.	15:25:01

1	Q One of those servers is Annotation Server	15:25:01
2	10, correct?	15:25:09
3	A That is correct.	15:25:16
4	Q And Figure 3 of Gupta illustrates further	15:25:17
5	components of Annotation Figure 10, correct?	15:25:20
6	A That is correct.	15:25:24
7	Q And looking at Figures 1 and 3 of Gupta,	15:25:34
8	does Annotation Server 10 provide an interface	15:25:54
9	with Client 15?	15:26:00
10	ATTORNEY SCHREINER: Objection. Form.	15:26:09
11	A Gupta discloses that the Annotation Server	15:26:33
12	10 controls the storage of annotations and the	15:27:28
13	provision to client computers. And the figure	15:27:31
14	that we're looking at shows basically a path	15:27:37
15	between that and the cloud which is represented as	15:27:42
16	a network. So it's basically depicting that it is	15:27:45
17	connected to the depicted network.	15:27:49
18	Q So Annotation Server 10, there was an	15:27:54
19	interface to receive requests from Client 15?	15:28:00
20	ATTORNEY SCHREINER: Objection. Form.	15:28:07
21	A Gupta discloses that the annotation server	15:28:08
22	communicates with the client computers via a	15:29:14

1	variety of protocols. So with respect to that,	15:29:18
2	certainly if you're connected to as depicted in	15:29:21
3	that figure, the network or a public network that	15:29:25
4	you would have some type of interface, whether	15:29:30
5	it's fiber, copper, RF to connect to the network.	15:29:32
6	Q And you referred to the figure. Was that	15:29:37
7	Figure 1 or Figure 3?	15:29:40
8	A The -- let's see here. I was referring to	15:29:43
9	Figure 1.	15:30:10
10	Q So in your previous answer you mention	15:30:18
11	that the the Gupta discloses the annotation server	15:30:24
12	communicates with the client computers via a	15:30:28
13	variety of protocols. Based on Figure 3, is HTTP	15:30:30
14	one of those protocols?	15:30:34
15	A Figure 3 wouldn't tell you that. It's	15:30:37
16	part of the disclosures in Gupta. Gupta does	15:30:43
17	reference HTTP, just looking at a picture can't	15:30:47
18	tell you that.	15:30:50
19	Q Well, Figure 3 depicts the HTTP with two	15:30:51
20	arrows between the client and the server; does it	15:30:55
21	not?	15:30:57
22	A It does, yes.	15:31:00

1	Q Doesn't that indicate to that there is a	15:31:02
2	connection between the client and the server using	15:31:05
3	the HTTP protocol?	15:31:07
4	A It does. I was thinking of Figure 1.	15:31:09
5	Sorry.	15:31:12
6	Q So is it fair to say that Annotation	15:31:16
7	Server 10 provides an HTTP interface with Client	15:31:18
8	15?	15:31:23
9	A It's fair to say that Annotation Server 10	15:31:26
10	would utilize an HTTP protocol as disclosed in	15:31:30
11	Gupta, and as pictured in Figure 3 as one of the	15:31:35
12	possible protocols.	15:31:40
13	Q So does that mean that Annotation 10	15:31:59
14	provides an HTTP interface with Client 15?	15:32:02
15	ATTORNEY SCHREINER: Objection. Form.	15:32:09
16	A It means that you can use HTTP to	15:32:10
17	facilitate communication as disclosed in Gupta	15:32:15
18	between the clients and the annotation server.	15:32:19
19	Q Does that communication between the	15:32:22
20	clients and the annotation server involve an HTTP	15:32:30
21	interface at Annotation Server 10?	15:32:34
22	ATTORNEY SCHREINER: Objection. Form.	15:32:36

1	A It's exposing to -- a POSITA would	15:33:14
2	understand that if you are disclosing the use	15:33:18
3	of -- the possible use of HTTP, and if you are	15:33:20
4	using HTTP, you are going to expose a particular	15:33:25
5	port for receiving HTTP messages coming in from	15:33:30
6	clients, the interface itself, that can be	15:33:40
7	implemented in various ways. It has nothing to do	15:33:42
8	with HTTP.	15:33:47
9	Q Can you turn to paragraph 47 of Gupta.	15:34:14
10	A One second. 47, yes.	15:34:23
11	Q So in the first half of paragraph 47 of	15:34:47
12	Gupta, Gupta is referring to the Annotation Server	15:34:52
13	10 that includes a Multimedia Annotation Web	15:34:56
14	Server, (MAWS) module 130, which is an Internet	15:34:59
15	Services Application Programming Interface," or in	15:35:10
16	parentheses (ISAPI) "plug-in for Internet	15:35:12
17	information server module 135. Together, these	15:35:18
18	two modules provide the web server functionality	15:35:22
19	of Annotation Server 10."	15:35:25
20	Do you see that?	15:35:27
21	A I do.	15:35:28
22	Q What is Gupta referring to when it states,	15:35:46

1	"web server functionality" in this context in	15:35:51
2	paragraph 47?	15:35:53
3	A Well, a POSITA would understand web server	15:35:57
4	functionality as a phrase to mean the capabilities	15:36:05
5	of a client server architecture. So that would be	15:36:09
6	the server side providing and feeding up web pages	15:36:14
7	specifically.	15:36:19
8	Q Feeding up web pages to clients?	15:36:21
9	A To requests coming in which would usually	15:36:34
10	be a client's request.	15:36:39
11	Q So in paragraph -- turning to	15:36:46
12	paragraph 48, paragraph 48 refers to the	15:37:10
13	Annotation Server 10 further including an	15:37:17
14	annotation back-end module (ABE) 132 which	15:37:20
15	contains functionality for accessing annotation	15:37:26
16	storage 17 and 18."	15:37:29
17	Do you see that?	15:37:31
18	A Yes, I do.	15:37:32
19	Q Is the annotation back-end module 132 a	15:37:41
20	software module?	15:37:58
21	A A POSITA would understand that to	15:38:45
22	encompass software.	15:39:19

1	Q And turning back to the multimedia	15:39:32
2	annotation web server module, MAWS 130 and the	15:39:34
3	ISAPI plug-in 135, would a POSITA also understand	15:39:39
4	those modules to be software?	15:39:44
5	ATTORNEY SCHREINER: Objection. Form.	15:39:46
6	A Gupta's disclosures within paragraph 47	15:39:53
7	would lead a person of ordinary skill in the art	15:40:26
8	to understand that those would most likely be a	15:40:29
9	software module.	15:40:32
10	Q And the middle of paragraph 47, Gupta	15:40:40
11	refers to Annotation Server 10, also including an	15:40:45
12	HTTP services module 131, which manages	15:40:49
13	communication with Client 15."	15:40:53
14	Do you see that?	15:40:54
15	A Yes, I do.	15:40:55
16	Q Would a POSITA understand the -- Gupta's	15:40:59
17	reference to HTTP services module 131 to mean	15:41:05
18	software?	15:41:09
19	A It would be software. Obviously it has to	15:41:18
20	be executed on hardware, but yes.	15:41:22
21	Q And these modules that we've been	15:41:24
22	discussing, the module 135, 130, 131 and 132,	15:41:34

1	these are all software modules that are running on	15:41:40
2	Annotation Server 10, correct?	15:41:43
3	A That's what's disclosed in Gupta, yes.	15:41:45
4	Q Gupta also discloses Annotation Store 17	15:42:19
5	and 18, correct? I believe that's in the first	15:42:28
6	sentence of paragraph 48, and also depicted in	15:42:30
7	Figures 1 and 3?	15:42:35
8	A That's disclosed and discussed in	15:42:40
9	paragraph 48. And yes, it's referenced as -- as	15:42:49
10	you've stated.	15:42:59
11	Q And these Stores 17 and 18 store	15:43:00
12	annotation data, correct?	15:43:15
13	A Gupta references annotation content which	15:43:16
14	would be associated with annotation data.	15:43:32
15	Q And Gupta discloses that the Annotation	15:43:35
16	Stores 17 and 18 are accessed by the annotation	15:43:45
17	back-end module, 132, correct, based on the first	15:43:49
18	sentence of paragraph 48?	15:43:53
19	A Gupta is referencing using the ABE Module	15:44:02
20	132 in order to access the Stores 17 and 18 for	15:44:16
21	composing outgoing email based on the annotation	15:44:21
22	data and processing incoming emails, yes.	15:44:25

1 Q Would a POSITA understand that there would 15:44:28
2 be messages exchanged between Annotation Server 10 15:44:34
3 and the Stores 17 and 18 in the context of 15:44:37
4 accessing annotation data? 15:44:42

5 A There would have to be calls made between 15:44:46
6 the back-end module and the database stores -- the 15:44:51
7 Stores 17 and 18, that is -- to be able to 15:44:56
8 interact. That would be a reasonable 15:45:00
9 understanding of a POSITA. 15:45:03

10 Q And your reference to a back-end module, 15:45:04
11 that's the ABE 132? 15:45:09

12 A Correct. 15:45:12

13 Q Would those calls between the ABE Module 15:45:13
14 132 and the Stores 17 and 18 take place in the 15:45:40
15 scenario of adding an annotation entry to the 15:45:46
16 stores? 15:45:55

17 A Could you repeat the question, please? 15:46:32

18 Q Sure. You referred to those calls between 15:47:32
19 the ABE Module 132 and Stores 17 and 18. Would 15:47:36
20 those calls take place in the scenario of adding 15:47:41
21 an annotation entry to the stores? 15:47:45

22 A In order to access the stores, you have to 15:47:47

1 have some agreed-upon structure, and certainly the 15:47:54
2 stores wouldn't be any use unless you can add to 15:48:00
3 it. So that would be a reasonable understanding 15:48:03
4 of what's going on between the module and the 15:48:04
5 stores. 15:48:07

6 Q And would calls between ABE Module 132 and 15:48:13
7 Stores 117 and 18 take place if an existing 15:48:16
8 annotation in the stores was being changed or 15:48:23
9 updated? 15:48:27

10 A The data store as disclosed in Gupta, 15:48:35
11 where it's storing annotation data, if you are 15:48:55
12 adding to a particular store, certainly you would 15:48:57
13 be calling that store passing function -- or 15:49:03
14 passing a message and requesting it to be saved to 15:49:08
15 that store. If it's -- it would be up to the 15:49:10
16 annotation backend to decide how to write that 15:49:17
17 information into the store. 15:49:21

18 Q But a request to change information stored 15:49:55
19 in the Stores 17 and 18 would involve calls going 15:50:00
20 between the ABE 138 and those Stores 17 and 18, 15:50:04
21 correct? 15:50:09

22 A The -- Gupta discloses that annotation 15:50:09

1 store controls the storage of annotations and 15:50:25
2 their provisions to client computers. So as part 15:50:29
3 of that functionality, as the requests -- the 15:50:32
4 edited annotation came from the clients, it would 15:50:40
5 be received by the annotation server and the 15:50:44
6 annotation server would write that to the back end 15:50:47
7 stores. 15:50:51

8 Q If a viewer client who wanted to view 15:51:26
9 annotations on the system was looking to access 15:51:28
10 those annotations, would it also access Annotation 15:51:32
11 Server 10, which in turn accesses the annotation 15:51:36
12 data in Stores 17 and 18, via calls? 15:51:41

13 ATTORNEY SCHREINER: Objection. Form. 15:51:49

14 A So again, Gupta discloses the 15:51:50
15 functionality of the annotation server as the 15:51:53
16 control in the system for storage and provision. 15:51:55
17 So if a client is connecting to the system and the 15:51:59
18 system decides or sends down annotation 15:52:08
19 information associated with whatever the request 15:52:13
20 from the client is, it would have to access the 15:52:17
21 back end. 15:52:19

22 And it discloses that it would do that, 15:52:19

1 for example, and constructing an email or other 15:52:24
2 messages it would send down to the client, 15:52:30
3 including those -- that information it accessed 15:52:31
4 from the store. 15:52:33

5 Q So I understand correctly, a client user 15:52:47
6 who is looking to access existing information, 15:52:49
7 existing annotation information,, that would 15:52:52
8 involve calls between the ABE 132 and the Stores 15:52:57
9 17 and 18, correct? 15:53:05

10 A In order to access the information, 15:53:12
11 annotation information in Gupta, Gupta is 15:53:16
12 disclosing the store for holding that information 15:53:20
13 so it would have to access those databases in 15:53:24
14 order to be able to provide -- provision the user 15:53:26
15 with that information. 15:53:30

16 Q And that access is handled by the ABE 15:53:31
17 Module 132? 15:53:35

18 A As disclosed in Gupta, ABE is in charge of 15:53:35
19 doing that. 15:54:01

20 Q So I'd like to turn to the -- to Figures 6 15:54:02
21 through 8 of Gupta. Let me know when you're 15:54:56
22 there. 15:55:01

1 A Figures 6 through -- okay. I'm at 6 and 7 15:55:06
2 and then there is 8 and 9, yes. 15:55:20

3 Q So is it fair to say that Figures 6 15:55:23
4 Through 8 illustrate a sequence of screen shots? 15:55:37

5 A Yes. 15:55:55

6 Q Turning to Figure 6, are you able to look 15:55:55
7 at the lower left-hand side of that figure, that 15:56:11
8 corner, there is an icon. 15:56:16

9 Do you see that? 15:56:22

10 A I do. 15:56:23

11 Q And that icon appears to be the letter "E" 15:56:24
12 superimposed on a white rectangle, correct? 15:56:29

13 A That's what it appears to be, yes. 15:56:35

14 Q Are you familiar with this icon? 15:56:39

15 A Yes, that would lead a person of ordinary 15:56:44
16 skill in the art to think of Internet Explorer in 15:56:47
17 that case. 15:56:50

18 Q Internet Explorer is a web browser 15:56:51
19 provided by Microsoft; is that correct? 15:56:53

20 A Yes, it is. 15:56:56

21 Q So is it fair to say that Figure 6 is a 15:56:57
22 screenshot of a web browser? 15:56:59

1	ATTORNEY SCHREINER: Objection. Form.	15:57:04
2	A It's -- it's certainly a toolbar, and it	15:57:04
3	has Internet Explorer associated with it.	15:57:11
4	Let me just reference Gupta to see. Yes,	15:57:17
5	it's an annotation toolbar in accordance with one	15:57:25
6	embodiment of the invention as disclosed in Gupta.	15:57:27
7	Q And given that the Internet Explorer web	15:57:32
8	browser icon is shown here, is it fair to say that	15:57:35
9	the screenshot is of a web browser?	15:57:39
10	ATTORNEY SCHREINER: Objection. Form.	15:57:41
11	A No, that would be speculation. It's	15:57:42
12	certainly possible to utilize Microsoft tool for	15:57:44
13	just implementing a toolbar itself. The frame and	15:57:49
14	everything else is dependent upon the software	15:57:53
15	person implementing it. It's just, as it says, as	15:57:57
16	Gupta says, take it at face value. It's the	15:58:00
17	annotation toolbar, or is an annotation toolbar.	15:58:04
18	Q So you're discounting the fact that this	15:58:13
19	annotation toolbar is represented by a Microsoft	15:58:15
20	Internet Explorer icon?	15:58:18
21	ATTORNEY SCHREINER: Objection. Form.	15:58:23
22	A I'm not discounting. I'm just saying	15:58:26

Transcript of Mark Mahon, Ph.D.
Conducted on March 13, 2025

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1	that's what Gupta describes it as.	15:58:28
2	ATTORNEY YAM: Okay. Let's go ahead and	15:58:42
3	take a break.	15:58:44
4	THE WITNESS: Okay. How long?	15:58:46
5	ATTORNEY YAM: Let's see. Ten minutes	15:58:48
6	again.	15:58:50
7	THE WITNESS: Okay.	15:58:51
8	THE VIDEOGRAPHER: We are now going off	15:58:54
9	the record. The time is 3:58 P.M.	15:58:55
10	(Recess.)	15:58:57
11	THE VIDEOGRAPHER: We are now back on	16:10:35
12	record. The time is 4:10 P.M.	16:10:43
13	BY ATTORNEY YAM:	16:10:45
14	Q Welcome back, Dr. Mahon.	16:10:46
15	A Thank you, sir.	16:10:50
16	Q During the break, did you speak with	16:10:52
17	anyone regarding this case?	16:10:53
18	A I did not.	16:10:54
19	ATTORNEY YAM: I'd like to shift gears to	16:11:04
20	another reference, the Fegan reference, which I am	16:11:05
21	uploading into the chat.	16:11:17
22	So I'm introducing what's already been	16:11:19

1 marked as Exhibit 1005, which is U.S. Patent
2 Publication 2005-0144305.

3 (Exhibit 1005, previously marked for
4 identification.)

5 A I'm downloading it.

6 I have Fegan open.

7 Q Great. Are you familiar with
8 Exhibit 1005, Fegan?

9 A Yes, I am.

10 Q For discussion today, we'll just refer to
11 this exhibit as "Fegan," or the "Fegan reference."

12 Sound good?

13 A Yes.

14 Q Great.

15 Can you turn to Figure 7 of Fegan.

16 A Figure 7, one second.

17 A I'm just going to rotate it so I can see
18 it.

19 Q Sure.

20 A Okay. I am at Figure 7.

21 Q Great. Is it fair to say that Figure 7
22 illustrates a screenshot?

1	A Yes.	16:13:17
2	Q Would you agree that this screenshot is of	16:13:18
3	a web browser?	16:13:20
4	A It appears to be from a web browser, yes.	16:13:21
5	Q And the -- the top of Figure 7 refers to	16:13:30
6	the ability for a user to edit any of the	16:13:35
7	information for that annotation including	16:13:37
8	reediting the time offsets from the source.	16:13:39
9	Do you see that?	16:13:43
10	A Yes, I do.	16:13:48
11	Q Would a POSITA have understood this	16:13:52
12	reference to editing annotation information	16:13:55
13	including editing time offsets to be, for	16:13:58
14	instance, editing the start and/or end position of	16:14:02
15	an annotation?	16:14:05
16	A Repeat the question, please?	16:15:19
17	Q Sure. Would a POSITA have understood the	16:15:20
18	reference in Figure 7 of Fegan referencing the	16:15:23
19	editing of annotation information including	16:15:26
20	editing of time offsets -- would a POSITA have	16:15:30
21	understood that to be a reference to editing the	16:15:33
22	start and/or end position of an annotation?	16:15:37

1	A Yes, yes, they would.	16:15:41
2	Q And Figure 7 depicts around the center of	16:15:47
3	fields for the start position and end position of	16:15:59
4	an annotation, correct?	16:16:02
5	A The middle of Figure 7 is presenting the	16:16:05
6	user an option to press start to start a recording	16:16:17
7	and -- and to stop, and then based on the	16:16:21
8	disclosure in Fegan, that they could modify that	16:16:28
9	by typing into the start and stop positions.	16:16:35
10	Q And does the start and end positions in	16:16:40
11	this example screenshot in Figure 7 contain the	16:16:44
12	numbers 3791 and 7474?	16:16:47
13	A Yes, it does contain those numbers.	16:16:56
14	Q So Figure 7 of Fegan is disclosing	16:16:59
15	providing a user the functionality to adjust, for	16:17:04
16	instance, the start position from 3791 to 3792?	16:17:09
17	A Certainly that would be a possible option.	16:17:16
18	Q Likewise, Figure 7 of Fegan is disclosing	16:17:34
19	providing the user the functionality to update the	16:17:38
20	end position from 7474 to 7475?	16:17:40
21	A It's certainly within the realm of	16:17:50
22	possibility.	16:17:52

1 Q By "within the realm of possibility," do 16:17:59
2 you mean that a POSITA would have understood 16:18:02
3 Figure 7 to be disclosing that functionality? 16:18:04

4 A Given that Figure 7 is showing input 16:18:09
5 windows for the start and stop times, and it 16:18:15
6 discloses that it shows a demonstration of 16:18:19
7 interactive multimedia annotation editing system 16:18:22
8 and the caption for Figure 7, that it would be 16:18:27
9 reasonable to say that if a -- an expectation of a 16:18:30
10 POSITA would be if you can type in 7475 into that 16:18:34
11 field to change that field. 16:18:39

12 Q Do you see at the bottom of this 16:18:50
13 screenshot, Figure 7 of Fegan there is a button 16:18:52
14 labeled "update"? 16:18:55

15 A Yes, I do. 16:18:56

16 Q Would a POSITA have understood that this 16:19:01
17 update button to -- to be a selection opportunity 16:19:03
18 to update the annotation? 16:19:10

19 ATTORNEY SCHREINER: Objection. Form. 16:19:15

20 A Well, as I discuss this update button in 16:19:25
21 Figure 7 in my report, that Fegan does not provide 16:19:30
22 any details associated with that button. So there 16:19:34

1	is no way to make a determination exactly what's	16:19:38
2	going on other than it's an update button.	16:19:41
3	Q Would it be fair to assume that the	16:19:45
4	annotation is not updated until a user selects the	16:19:50
5	update button?	16:19:53
6	ATTORNEY SCHREINER: Objection. Form.	16:19:57
7	A Well, what I'm saying is, it's based on	16:20:01
8	the Fegan disclosures, it's indeterminant exactly	16:20:05
9	what happens when you type either something in	16:20:07
10	and/or when you hit the update button.	16:20:10
11	Q Why would Fegan show an update button if	16:20:14
12	there was -- if there was no point to the button?	16:20:19
13	A I don't -- well, there may be a point to	16:20:24
14	the button that Fegan hasn't discussed or hasn't	16:20:28
15	disclosed other than what was -- what's being	16:20:30
16	shown. "Update," to a person of ordinary skill in	16:20:33
17	the art would mean typically mean to update	16:20:37
18	something, but Fegan doesn't discuss it at all.	16:20:39
19	It could be the particular visual studio, whatever	16:20:44
20	it used to present the dialogue box and the	16:20:49
21	default name for that button. Fegan just doesn't	16:20:56
22	talk about it.	16:20:59

1 Q And a person of ordinary skill in the art 16:21:00
2 having a bachelor's of science in computer science 16:21:02
3 would not understand what an update button means 16:21:05
4 in this context of Figure 7? 16:21:09

5 A Well, what I'm saying is it would require 16:21:12
6 them to make an assumption about what is going on, 16:21:14
7 is what I'm saying. 16:21:17

8 Q What's the reasonable assumption to be 16:21:32
9 made here with respect to the update button in 16:21:35
10 Figure 7 of Fegan? 16:21:38

11 ATTORNEY SCHREINER: Objection. Form. 16:21:39

12 A That requires speculation on my part, 16:21:41
13 obviously. As I mention, a person of ordinary 16:21:44
14 skill in the art would understand or expect that 16:21:46
15 if you hit "update," it's going to update 16:21:49
16 something. It could be the entire screen, for 16:21:52
17 example, it could be field information. Fegan 16:21:54
18 doesn't say. 16:22:00

19 Q Is it fair to say that the update button 16:22:14
20 is -- is used to perform an updating? 16:22:17

21 ATTORNEY SCHREINER: Objection. Form. 16:22:27

22 Q Let me repeat the question. 16:22:31

1 Is it fair to say that the update button 16:22:33
2 in Figure 7 of Fegan, is used to perform an 16:22:35
3 updating when selected? 16:22:38

4 ATTORNEY SCHREINER: Objection. Form. 16:22:42

5 A Well, they would -- again, the 16:22:43
6 possibilities of reloading the page, uploading the 16:22:46
7 recording again or -- just refreshing the actual 16:22:51
8 URL could be associated with update. There was 16:22:57
9 just too many options to know exactly what's 16:23:01
10 happening when you hit the update. Update would 16:23:03
11 refer to updating something. What that something 16:23:06
12 is is unknown in Fegan. 16:23:08

13 Q So after a user changes any of the 16:23:34
14 information shown in Figure 7 of Fegan, is there 16:23:36
15 any ability to have those changes stored at the 16:23:41
16 server in Fegan? 16:23:44

17 ATTORNEY SCHREINER: Objection. Form. 16:23:46

18 A Could you repeat the question? 16:24:49

19 Q Sure. After a user changes any of the 16:24:51
20 information shown in Figure 7 of Fegan, does Fegan 16:24:54
21 disclose the ability to have those changes stored 16:25:00
22 at the server? 16:25:03

1	ATTORNEY SCHREINER: Objection. Form.	16:25:07
2	A I don't recall anything in Fegan	16:25:08
3	discussing what happens with respect to the	16:25:10
4	functionality in Fegan seven -- Figure 7 of Fegan.	16:25:12
5	-- I don't -- I think Fegan is silent on that.	16:25:19
6	Q Can you turn to paragraph 3 of Fegan.	16:25:21
7	A Okay. I'm there.	16:25:34
8	Q Paragraph 3 reads, "The present invention	16:25:35
9	relates to systems and methods for identifying,	16:25:37
10	segments, collecting, annotating, and publishing	16:25:39
11	multimedia materials. In some embodiments, the	16:25:45
12	present invention provides a comprehensive	16:25:47
13	server-side system for editing, annotating,	16:25:50
14	managing and presenting multimedia events from a	16:25:53
15	plurality of multimedia sources."	16:25:57
16	Did I read that correctly?	16:26:01
17	A Yes, you did.	16:26:02
18	Q So paragraph 3 of Fegan is referencing a	16:26:03
19	comprehensive server-side system for editing,	16:26:06
20	annotating, managing, and presenting multimedia	16:26:09
21	events, correct?	16:26:15
22	A And that's the only place Fegan references	16:26:16

1	that. Everything else is -- discusses a	16:26:18
2	client-side implementation.	16:26:21
3	Q So can you turn to paragraph 5.	16:26:29
4	A Yes.	16:26:32
5	Q Paragraph 5 also refers to "multimedia	16:26:34
6	materials that are stored on remote servers," and	16:26:38
7	again, refers to "a comprehensive server-side	16:26:42
8	system for managing and presenting multimedia	16:26:44
9	events."	16:26:47
10	Do you see that?	16:26:48
11	A Yes, that's another broad brush that Fegan	16:26:48
12	uses to discuss the system. And it is a second	16:26:51
13	example, true, of where it uses the phrase	16:26:56
14	"server-side."	16:26:59
15	Q Can you turn to paragraph 7.	16:27:00
16	A I'm there.	16:27:08
17	Q The last sentence of paragraph 7 refers to	16:27:09
18	"the technical tools for carrying out the	16:27:11
19	multimedia presentation are maintained on the	16:27:14
20	server side rather than the forcing the user on	16:27:17
21	the client side to navigate the difficulties of	16:27:19
22	the management of the multimedia files."	16:27:22

1	Do you see that?	16:27:26
2	A Yes, I do.	16:27:29
3	Q That's another reference to server-side	16:27:29
4	approach to annotations, correct?	16:27:33
5	A It uses the phrase server-side there also,	16:27:39
6	yes.	16:27:42
7	Q So Fegan in many locations describes a	16:27:46
8	server-side approach as evidenced by the	16:27:49
9	paragraphs that we discussed, paragraphs 3, 5, and	16:27:54
10	7, correct?	16:27:57
11	ATTORNEY SCHREINER: Objection. Form.	16:27:58
12	A I disagree with that. It does use the	16:27:59
13	phrase "server-side", but in its disclosures it	16:28:01
14	does not talk about actually implementing and how	16:28:05
15	enabling a server-side system. It actually	16:28:14
16	describes a client-side system being implemented.	16:28:20
17	Q Can you turn to paragraph 75.	16:28:23
18	A One second, please.	16:28:45
19	Okay. Paragraph 75, "Controlling	16:28:59
20	Multimedia Content Playback."	16:29:01
21	Q Excuse me. Turn to paragraph 81.	16:29:12
22	A 81, okay.	16:29:16

1	Q The bottom two sentences of paragraph 81	16:29:24
2	refers to Figure 7, correct?	16:29:28
3	A Yes, it does.	16:29:34
4	Q And paragraph 81 refers to Figure 7	16:29:36
5	showing a saved annotation that has been opened	16:29:39
6	for further editing, correct?	16:29:42
7	A That is correct.	16:29:44
8	Q So this is -- Figure 7 is showing an	16:29:47
9	annotation that has already been saved, correct?	16:29:50
10	A It does say that, yes.	16:29:57
11	Q And as we discussed, paragraphs 3, 5, and	16:29:59
12	7 refer to a comprehensive server-side system for	16:30:10
13	edit, annotating, managing, presenting multimedia	16:30:14
14	events."	16:30:19
15	Do you recall that?	16:30:20
16	ATTORNEY SCHREINER: Objection. Form.	16:30:21
17	A It does use the term "server-side," and it	16:30:23
18	does use the word "comprehensive."	16:30:26
19	Q And it's referring to comprehensive	16:30:42
20	server-side system for editing, annotating,	16:30:45
21	managing, and presenting multimedia events,	16:30:49
22	correct?	16:30:54

1 A Those are the words in that -- in those 16:30:54
2 lines that we looked at. 16:30:57

3 Q Are you applying those words that are 16:31:05
4 provided in paragraph 3, which is under the field 16:31:10
5 of the invention, paragraph 5, which is under the 16:31:13
6 summary of the invention, and paragraph 7, also 16:31:16
7 under the summary of the invention? Are you 16:31:19
8 applying to those descriptions towards Figure 7? 16:31:23

9 ATTORNEY SCHREINER: Objection. Form. 16:31:25

10 A I'm applying what's disclosed in the Fegan 16:31:27
11 reference about the functionality of Figure 7, 16:31:32
12 along with all the other disclosures within the 16:31:35
13 entirety of Fegan from the perspective of a person 16:31:38
14 of ordinary skill in the art, is what I'm doing. 16:31:45

15 Q And where is -- in Figure 7, which shows a 16:31:50
16 saved annotation, where is that annotation saved? 16:31:53

17 A As I discuss in my declaration, the -- all 16:31:57
18 the disclosures in Fegan discuss the editing 16:32:12
19 occurring on the client side. And so the client 16:32:17
20 would then be performing that editing, and then 16:32:21
21 that information would be saved in the memory at 16:32:28
22 the client and then sent up to the system for 16:32:34

1	storage in the back end database.	16:32:36
2	Q When you say "sent up to the system," does	16:32:39
3	that mean the server side?	16:32:51
4	A It would be in Fegan's disclosed system.	16:32:55
5	It would be sent up into the server for being	16:33:01
6	saved.	16:33:06
7	ATTORNEY YAM: I'd like to shift gears to	16:33:44
8	Vasilevsky. And I am introducing what's already	16:33:46
9	been marked as Exhibit 1008, which is World	16:33:55
10	Intellectual Property Organization WO Publication	16:34:05
11	Number 03-067594,	16:34:08
12	(Exhibit 1008, marked for identification.)	16:34:17
13	A It's open.	16:34:32
14	Q Are you familiar with this Exhibit 1008?	16:34:33
15	A Yes, I am.	16:34:37
16	Q And for discussion purposes today, we'll	16:34:40
17	refer to this Exhibit 1008 as a Vasilevsky or the	16:34:45
18	Vasilevsky reference.	16:34:49
19	Does that sound good?	16:34:50
20	A Yes.	16:34:51
21	Q I'd like you to also turn to your	16:34:52
22	declaration paragraph 306.	16:35:09

1	A I'm down there.	16:35:27
2	Q So Vasilevsky describes a home area	16:35:28
3	network, or HAN for short. Do you agree?	16:35:34
4	A Yes, it does.	16:35:39
5	Q And in paragraph 306 of your declaration,	16:35:41
6	you opine that Vasilevsky's home area network is a	16:35:46
7	private network, not a public network.	16:35:54
8	Do you see that?	16:35:58
9	A Yes.	16:35:59
10	Q What makes Vasilevsky's home area network	16:36:00
11	a private network, in your opinion?	16:36:05
12	A The disclosures in Vasilevsky are	16:36:07
13	consistent both with the nomenclature and with the	16:36:13
14	system being a home area network.	16:36:16
15	Q And, again, here you refer to a private	16:36:22
16	network, and as you may recall earlier today, we	16:36:24
17	had been discussing what it means to be a private	16:36:27
18	network.	16:36:29
19	Do you recall that?	16:36:30
20	A We discuss certain aspects associated with	16:36:31
21	what it means to be a private network, yes.	16:36:36
22	Q Does your testimony earlier today	16:36:39

1 regarding what it means to be a private network 16:36:42
2 likewise apply here when you refer to a private 16:36:44
3 network in paragraph 306 of your declaration? 16:36:46

4 A My reference to a private network 16:36:49
5 encompasses what I -- what we discussed previously 16:36:54
6 and additional elements associated with what a 16:36:57
7 person of ordinary skill in the art would 16:37:04
8 understand would be a private network. 16:37:06

9 Q So what makes a home area network a 16:37:18
10 private network? 16:37:20

11 A The -- a POSITA would understand that a 16:37:26
12 home area network is intended by its very 16:37:31
13 nomenclature and name and also common 16:37:36
14 understanding to have deployment and within a 16:37:38
15 narrow network environment, that is controlled 16:37:45
16 environment, hence the name home area network. 16:37:49

17 And Vasilevsky's disclosures are 16:37:52
18 consistent with that understanding. He, as a 16:37:54
19 matter of fact, says, "Home area networks are 16:37:59
20 typically small-scale electronic cable or wired 16:38:00
21 communication networks used to interconnect a 16:38:04
22 variety of small-to-moderate-sized appliances, 16:38:07

1 computers, and consumer electronics."

16:38:09

2 That's all consistent.

16:38:10

3 Q So are you saying that the fact that the
4 home area network is confined to a home, that that
5 makes it a private network?

16:38:14

16:38:16

16:38:21

6 A What I'm saying is that's certainly
7 consistent with both what Vasilevsky is
8 disclosing, the disclosures are consistent with
9 that and that is certainly consistent with the
10 understanding of a POSITA.

16:38:24

16:38:28

16:38:30

16:38:34

16:38:37

11 Q So if a home area network were not limited
12 to a home, but say, connected a main house to a
13 guest house, or if a network included a connection
14 between a main house and a guest house, would that
15 still be a home area network? Would that still be
16 a private network?

16:38:38

16:38:56

16:39:02

16:39:05

16:39:07

16:39:10

17 ATTORNEY SCHREINER: Objection. Form.

16:39:11

18 A Yeah, you'd have to give me specifics
19 about the implementation, certainly if anything
20 has changed in the architecture. The geographic
21 limitation is due to typical deployments and the
22 general understanding. So you're asking me to go

16:39:12

16:39:14

16:39:17

16:39:22

16:39:26

1 down hypotheticals that are almost meaningless in 16:39:30
 2 the context of the understanding of what a home 16:39:33
 3 area network is. You'd have to give me more 16:39:35
 4 specifics. 16:39:38

5 Q Would Vasilevsky's home area network 16:39:39
 6 include a home Ethernet network? 16:39:50

7 ATTORNEY SCHREINER: Objection. Form. 16:39:55

8 A Again, Vasilevsky, I don't think discusses 16:39:57
 9 particular networking protocols that could be 16:40:06
 10 used. I don't recall that Vasilevsky did that, 16:40:09
 11 but Ethernet is a known protocol used for 16:40:15
 12 networking and certainly can be used as -- as part 16:40:18
 13 of a private network. 16:40:21

14 Q What about Wi-Fi? Would Vasilevsky's 16:40:25
 15 home area network include a home Wi-Fi network? 16:40:28

16 A Well, as I just mentioned Vasilevsky 16:40:32
 17 doesn't address particular protocols. Wi-Fi is a 16:40:37
 18 protocol that can be used to implement 16:40:42
 19 communications between and among home area network 16:40:45
 20 and a private network. 16:40:48

21 Q And can a home area network include a 16:40:52
 22 connection to the Internet? 16:41:01

1	A	There is no reason it can't.	16:41:07
2	Q	Do you have a home area network?	16:41:09
3	A	Yes, I do.	16:41:16
4	Q	Is your home area network connected to the	16:41:17
5		Internet?	16:41:20
6	A	Through a firewall and router, yes, it is.	16:41:20
7	Q	So there is nothing in Vasilevsky that	16:41:23
8		would preclude that home area network from being	16:41:43
9		connected to the Internet?	16:41:46
10	A	If you look at the disclosures in	16:41:49
11		Vasilevsky, it specifically references a broadband	16:41:59
12		connection, which, again, could be considered a	16:42:07
13		connection to a -- a high-speed network. And so	16:42:10
14		certainly that's a possibility.	16:42:18
15	Q	And by "broadband connection," are you	16:42:33
16		referring to what's illustrated in Figure 1 of	16:42:36
17		Vasilevsky at the top left, I believe it's labeled	16:42:39
18		102?	16:42:44
19	A	It does depict, or it does label 102 as a	16:42:57
20		broadband connection.	16:43:01
21	Q	And that's the broadband connection that	16:43:04
22		you were referencing in your prior response?	16:43:08

1	A Yes.	16:43:10
2	Q Turn to your declaration at paragraph 340.	16:43:52
3	And that starts at, it's numbered as Page 173 at	16:43:56
4	the bottom of the page.	16:44:00
5	A 340?	16:44:03
6	Q Paragraph 340.	16:44:04
7	A Okay. I'm there.	16:44:08
8	Q So in paragraph 340, you present a	16:44:10
9	proposed modification -- illustration of a	16:44:23
10	proposed modification, correct, that's on	16:44:26
11	Page 174?	16:44:28
12	A What I present is my understanding of	16:44:32
13	what's in the petitioner's proposed combination,	16:44:37
14	and I illustrate that in the figure on the -- on	16:44:42
15	page 174.	16:44:45
16	Q And that illustration takes certain	16:44:46
17	aspects from Figure 1 of Vasilevsky, correct?	16:44:55
18	A That figure takes the -- the description	16:45:00
19	and the petition associated with the -- the	16:45:08
20	challenged video-editing environment. And it does	16:45:13
21	then append that to -- or puts that in this figure	16:45:17
22	to show how the -- as I understand the assertions	16:45:23

1 in the petition, at least in a particular example 16:45:25
2 of my understanding of how the assertions in the 16:45:28
3 petition would be constituted. 16:45:30

4 Q And in this depiction, you omit certain 16:45:33
5 portions from -- that are shown in Figure 1, for 16:45:43
6 example, the digital tuner 108 and the analog 16:45:46
7 tuner 112; is that correct? 16:45:52

8 A Well, I show what was put forward as the 16:45:56
9 VEE in the petition. That's what I'm showing. 16:46:01

10 Q But what you're showing omits certain 16:46:07
11 portions that are shown in Figure 1 of Vasilevsky, 16:46:09
12 correct? 16:46:13

13 A As the petition omitted those, I also 16:46:13
14 omitted those in the figure. 16:46:17

15 Q Does the petition refer to omitting those 16:46:21
16 elements in Figure 1 of Vasilevsky? 16:46:23

17 A It states what comprises the VEE with 16:46:28
18 respect to the Vasilevsky's disclosure. So I took 16:46:32
19 that information and used it to exactly depict 16:46:35
20 what was described and show an possible 16:46:42
21 implementation of how that could be understood by 16:46:45
22 a POSITA. 16:46:47

1 Q Would your opinions change if those 16:46:56
2 elements were not omitted from Figure 1 of 16:46:59
3 Vasilevsky? 16:47:01

4 A No, there is additional problems which I 16:47:04
5 address in my declaration associated with that. 16:47:06

6 Q And where is that addressed? 16:47:10

7 A In the following paragraphs. 16:47:13

8 Q Well, the following paragraphs like 16:47:22
9 paragraph 341 refers to the lack of capability to 16:47:24
10 receive, demodulate analog television 16:47:28
11 transmissions and digital television 16:47:31
12 transmissions, right? 16:47:34

13 A It does, yes. 16:47:36

14 Q Doesn't that assume that those respective 16:47:37
15 tuners are omitted? 16:47:40

16 A Well, it certainly does based on the 16:47:43
17 disclosure in the petition. I also, there is 16:47:45
18 additional technical challenges that would come up 16:47:49
19 with implementing that in the -- in a public 16:47:51
20 network environment and how that functionality, as 16:47:55
21 disclosed in Vasilevsky, would be able to be 16:48:00
22 implemented in that environment. And so as you go 16:48:03

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1	through the -- my declaration here, I discuss	16:48:08
2	that.	16:48:10
3	ATTORNEY YAM: I think I'm nearly done,	16:48:32
4	but I'd like to take a short break just to regroup	16:48:33
5	and check.	16:48:36
6	THE WITNESS: Okay.	16:48:37
7	ATTORNEY YAM: Ten minutes.	16:48:39
8	THE VIDEOGRAPHER: Going off the record.	16:48:40
9	The time is 4:48 P.M.	16:48:41
10	(Recess.)	16:48:45
11	THE VIDEOGRAPHER: We are now back on	16:57:08
12	record. The time is 4:57 P.M.	16:57:11
13	BY ATTORNEY YAM:	16:57:14
14	Q Welcome back, Dr. Mahon.	16:57:18
15	A Thank you, sir.	16:57:20
16	Q During the break, did you speak with	16:57:21
17	anyone regarding this case?	16:57:23
18	A I did not.	16:57:24
19	Q Are you aware that there is a district	16:57:25
20	court litigation in connection with the '286	16:57:28
21	patent?	16:57:30
22	A That is my understanding.	16:57:32

1	Q Have you discussed that litigation with	16:57:33
2	anyone?	16:57:38
3	A I have not.	16:57:39
4	Q Have you received any documents relating	16:57:40
5	to that litigation?	16:57:45
6	A No, I have not.	16:57:46
7	Q Are you aware of -- that there is a	16:57:47
8	reexamination proceeding in connection with the	16:57:53
9	'286 patent?	16:57:56
10	A Not that I can recall, no.	16:57:57
11	Q Fair to say then that you're not aware of	16:57:59
12	receiving any documents relating to any such	16:58:04
13	proceeding?	16:58:06
14	A That is correct.	16:58:06
15	ATTORNEY YAM: I have no further	16:58:09
16	questions. I pass the witness.	16:58:10
17	Thank you for your time, Dr. Mahon.	16:58:13
18	THE WITNESS: Thank you, sir.	16:58:15
19	ATTORNEY SCHREINER: I just have a few	16:58:19
20	follow-up questions for you, Dr. Mahon.	16:58:20
21	EXAMINATION BY	16:58:20
22	ATTORNEY SCHREINER:	16:58:23

1	Q Let's take a look at your declaration	16:58:23
2	that's Exhibit 2015, starting at paragraph 81.	16:58:29
3	A Okay. I'm there.	16:58:44
4	Q And do you remember generally earlier	16:58:46
5	there was some testimony you gave about the	16:58:50
6	meaning of Limitation 13.1 and you said something	16:58:54
7	to the effect of it's defined by, you know, the	16:58:59
8	words in the limitation.	16:59:06
9	Do you recall that testimony generally?	16:59:08
10	A Yes, I do.	16:59:10
11	ATTORNEY YAM: Objection to form.	16:59:17
12	Q And so I want to -- in paragraphs 81	16:59:21
13	through 92, is it correct that you set forth your	16:59:26
14	understanding of the ordinary and customary	16:59:32
15	meaning of Limitation 13.1 in view of the	16:59:36
16	intrinsic evidence, including the language of the	16:59:39
17	claim, the specification, and the prosecution	16:59:42
18	history?	16:59:45
19	ATTORNEY YAM: Objection to form, scope,	16:59:46
20	leading.	16:59:49
21	A Yes, in putting together my declaration,	16:59:49
22	after evaluating the petition, I obviously read	16:59:53

1 through the specification itself and then the 16:59:57
2 patent -- the prosecution history. And then as I 17:00:00
3 discussed through these paragraphs, I'm discussing 17:00:09
4 what I learned from the combination of my overall 17:00:11
5 analysis of both the claim language, the 17:00:14
6 specification itself and the prosecution history 17:00:16
7 to understand what was meant by the disclosures 17:00:18
8 with respect to the claims. And particularly here 17:00:22
9 I'm discussing Claim Limitation 13.1. 17:00:25

10 Q And can you read aloud for the record your 17:00:29
11 paragraph 82 regarding Limitation 13.1. 17:00:32

12 ATTORNEY YAM: Objection. Form, scope. 17:00:35

13 A Yes. "A POSITA would understand, 17:00:38
14 'computer system comprising a video-editing 17:00:44
15 environment, and being disposed at a server side 17:00:49
16 of a public network' as referring to a 17:00:52
17 server-side, video-editing environment with one or 17:00:56
18 more applications for performing editing of cue 17:01:00
19 point information to enable remote cue point 17:01:05
20 editing by the client terminal as further recited 17:01:10
21 in the claim. Further, the prosecution history 17:01:14
22 and the specification confirm that the server 17:01:18

1 side, 'video-editing environment' includes an 17:01:22
2 application, or applications, enabling remote cue 17:01:28
3 point editing by the client terminal, as opposed 17:01:32
4 to local cue point editing using a client side 17:01:37
5 application as described in the background of the 17:01:41
6 invention. See '286 patent, Column 2, lines 16 17:01:44
7 through 25." 17:01:53

8 Q And that was your opinion on the meaning 17:01:54
9 of Limitation 13.1 as set forth in your 17:01:59
10 declaration, correct? 17:02:02

11 ATTORNEY YAM: Objection. Form, leading, 17:02:04
12 scope. 17:02:05

13 A Yes, I specifically included this to 17:02:06
14 provide information regarding how I form my 17:02:09
15 opinions and how they were informed. 17:02:13

16 Q And does that remain your opinion on the 17:02:18
17 meaning of Limitation 13.1 as you have set forth 17:02:21
18 in paragraph 82? 17:02:24

19 ATTORNEY YAM: Objection. Form, scope. 17:02:26

20 A Yes, both in paragraph 82 and with respect 17:02:29
21 to my responses today during the deposition, that 17:02:32
22 is my understanding. 17:02:35

1	Q So you didn't intend to say anything	17:02:36
2	during today's deposition that was inconsistent	17:02:41
3	with what you set forth as your understanding of	17:02:47
4	that limitation in your paragraph 82?	17:02:49
5	ATTORNEY YAM: Objection. Leading, form,	17:02:52
6	scope, foundation.	17:02:53
7	A No, I did not intend to say anything	17:02:54
8	inconsistent. I've tried to be actually verbose	17:02:57
9	in supporting this understanding during my	17:03:01
10	answers. And if I wasn't clear, then obviously	17:03:03
11	I -- I -- would state that this is definitely my	17:03:09
12	opinion; I don't intend to deviate from it.	17:03:15
13	Q In view of Mr. Yam's objection, let me	17:03:20
14	just rephrase that question.	17:03:23
15	Did you intend to convey anything today	17:03:24
16	inconsistent or at odds with your understanding of	17:03:29
17	the claim limitation as you've kind of set forth	17:03:34
18	in paragraph 82?	17:03:36
19	ATTORNEY YAM: Objection. Form,	17:03:37
20	foundation, scope.	17:03:39
21	A Absolutely not.	17:03:41
22	Q And did the prosecution history of the	17:03:47

1	'286 patent inform your understanding of	17:03:54
2	Limitation 13.1?	17:03:56
3	ATTORNEY YAM: Objection. Form, scope.	17:04:00
4	A Yes, as I have in the following	17:04:03
5	paragraphs, I discuss the prosecution history and	17:04:05
6	what was disclosed or what I found in the	17:04:09
7	prosecution history with respect to the claim	17:04:12
8	language in 13.1.	17:04:15
9	Q And that's in paragraphs 83 through 85; is	17:04:18
10	that correct?	17:04:30
11	ATTORNEY YAM: Objection. Leading, form,	17:04:30
12	scope.	17:04:33
13	A Yes, under heading one, prosecution	17:04:33
14	history would include paragraphs 83, 84, and 85.	17:04:36
15	Q And do you also cite the claim language in	17:04:43
16	Claim 13 in support of your understanding of	17:04:49
17	Limitation 13.1?	17:04:53
18	ATTORNEY YAM: Objection. Form, scope,	17:04:57
19	foundation.	17:05:00
20	A Yes, I do. Under Section 2 in that	17:05:01
21	section, the claim language in paragraphs 86, 87,	17:05:03
22	I reference specifically the claim language.	17:05:09

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1 Q And did you also refer to disclosure in 17:05:14
2 the specification supporting your understanding of 17:05:18
3 Limitation 13.1? 17:05:20

4 ATTORNEY SCHREINER: Objection. Form, 17:05:22
5 scope, foundation. 17:05:24

6 A Yes, in terms of presenting and wrapping 17:05:25
7 everything together based on my analysis, the 17:05:29
8 prosecution history, claim language, and then the 17:05:33
9 third element of that obviously, as I stated 17:05:35
10 originally, was my review of the disclosure. And 17:05:36
11 in Section 3, in paragraphs 88 through 92, I 17:05:41
12 discuss the disclosures in the '286 patent. 17:05:47

13 ATTORNEY SCHREINER: I have no further 17:05:52
14 questions. I pass the witness, Stephen. 17:05:53

15 ATTORNEY YAM: One moment. I have no 17:06:06
16 questions. Thank you. 17:06:28

17 THE WITNESS: Thank you. 17:06:29

18 ATTORNEY SCHREINER: Thank you very much. 17:06:31

19 THE VIDEOGRAPHER: This marks the end of 17:06:31
20 the deposition of Dr. Mark Mahon. The time on the 17:06:33
21 video monitor is 5:06 P.M. (Time Noted: 5:06 P.M.) 17:06:35
22

ACKNOWLEDGMENT OF DEPONENT

I, DR. MARK MAHON, do hereby acknowledge
that I have read and examined the foregoing
testimony and the same is a true, correct, and
complete transcription of the testimony given by
me and any corrections appear on the attached
errata sheet signed by me.

(SIGNATURE)

(DATE)

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Anita M. Trombetta, Certified Reporter and
3 Notary Public within and for the State of New York
4 do hereby certify: That DR. MARK MAHON, the
5 witness whose deposition is hereinbefore set
6 forth, was duly sworn by me before the
7 commencement of such deposition and that such
8 deposition was taken before me and is a true
9 record of the testimony given by such
10 witness.

11 I further certify that the adverse party, was
12 represented by counsel at the
13 deposition.

14 I further certify that the deposition of
15 DR. MARK MAHON remotely on March 13th, 2025,
16 commencing at 10:00 A.M. to 5:06 P.M., Eastern
17 Time.

18 I further certify that I am not related to
19 any of the parties to this action by blood or
20 marriage, I am not employed by or an attorney to
21 any of the parties to this action, and that I am
22 in no way interested, financially or otherwise, in
the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
Hand this 14th day of March, 2025.



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A			
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