

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3

4
5 VIZIO, INC.,
6 Petitioner

7 v.

8 MULITMEDIA TECHNOLOGIES PTE., LTD.,
9 Patent Owner

10
11 Case IPR2024-00723
12 Patent 9,578,384
13

14
15
16
17 DEPOSITION OF DR. RAJEEV SURATI
18 TAKEN REMOTELY BY VIDEOCONFERENCE
19 Monday, April 28, 2025
20
21
22
23

24 Reported by: Mary Ann Payonk
25 Job No. 2191

Monday, April 28, 2025

11:30 a.m. Eastern

DEPOSITION OF DR. RAJEEV SURATI, taken remotely by
videoconference pursuant to Notice and agreement of
counsel, stenographically reported by Mary Ann Payonk,
Shorthand Reporter and Notary Public, CA CSR No. 13431.

All attorneys participating in this deposition
acknowledge that the reporter is not physically present
in the deposition room and there is no objection to the
oath being administered remotely.

1 APPEARANCES:

2 ON BEHALF OF PETITIONER:

3 MINGHUI YANG, ESQ.

4 CARMICHAEL IP, PLLC

5 8607 Westwood Center Drive, Suite 270

6 Tysons, VA 22182

7
8 ON BEHALF OF PATENT OWNER:

9 REX HWANG, ESQ.

10 SKIERMONT DERBY LLP

11 633 West Fifth Street, Suite 5800

12 Los Angeles, CA 90071

13
14 ALSO PRESENT:

15 Anniliese Coleman, BlueBear Law

INDEX TO EXAMINATIONS

WITNESS	PAGE
DR. RAJEEV SURATI	
Examination by Attorney Hwang	5
Examination by Attorney Yang	105

INDEX TO REFERENCED EXHIBITS

Petition	38
Exhibit No. 1001	14
Exhibit No. 1003	26
Exhibit No. 1018	47
Exhibit No. 2002	11

1 THE REPORTER: My name is Mary Ann Payonk, and
2 my California license number is 13431. I will now swear
3 the witness.

4 DR. RAJEEV SURATI,

5 called as a witness, having been duly
6 sworn, was examined and testified as
7 follows:

8 EXAMINATION

9 BY ATTORNEY HWANG:

10 Q. Good -- I don't know if it's morning or
11 afternoon. You said you're in Boston before the --
12 before we started?

13 A. Yeah. So it's 11:35, so whatever you call
14 that.

15 Q. Okay. Well, good day. I guess to start can
16 you please state and spell your name for the record?

17 A. Sure. My name is Rajeev Surati. The first
18 name is R-A-J-E-E-V. Last name is Surati, S-U-R-A-T-I.

19 Q. And you understand that you are under oath
20 today?

21 A. I do.

22 Q. And is there any reason why you can't give
23 your full and accurate testimony today?

24 A. Not that I'm aware of.

25 Q. Okay. And I know you've had your deposition

1 taken before. Approximately how many times?

2 A. Maybe 33 times.

3 Q. Okay. And how many of those in IPRs?

4 A. Probably half of them.

5 Q. And out of those IPR depositions, how many on
6 behalf of the Patent Owner?

7 A. I would say maybe half or maybe more than
8 half.

9 Q. Okay. And I'm sure you know these things.
10 Let me go over some basic ground rules. If you need a
11 break, let me know. It should be pretty casual today.
12 The only thing is if there's a question pending, I would
13 ask that you finish the line of questioning --

14 A. Correct.

15 Q. -- if possible. I understand something -- you
16 know, if something happens. We're all human. So just
17 let me know.

18 If there's a question that you don't
19 understand, please let me know; otherwise, I'll assume
20 that you understood the question that was asked.

21 Do you understand?

22 A. I do.

23 Q. Okay. At certain times during the deposition
24 I may ask you to give me an estimate of something. Do
25 you understand the difference between an estimate and a

1 guess?

2 A. You mean for the --

3 Q. I can give you an example.

4 A. Why don't you give me example so -- just so
5 that I --

6 Q. Yeah.

7 A. -- get some idea, uh-huh.

8 Q. So if I ask you to give me an estimate of the
9 length of, you know, your dining table, even though you
10 don't know the precise length of your dining table, you
11 can give me an estimate of the length based on your
12 personal knowledge. So that would be an estimate.

13 That can be compared with a guess. If I asked
14 you to tell me the length of my dining room table, and
15 you've never been to my house, you would have to guess
16 as to how long the dining room table is.

17 Do you understand the difference between an
18 estimate and a guess now --

19 A. It sounds like --

20 Q. -- roughly?

21 ATTORNEY YANG: Object to form.

22 BY ATTORNEY HWANG:

23 Q. Go ahead.

24 A. Yeah, it sounds like you're saying something
25 like if you have some special a priori knowledge, that

1 can help you make an -- an estimate, but if it's just
2 like you have no idea other than tables aren't long --
3 like, aren't longer than 100 feet and you just come up
4 with some number, 2 or 7, they're guesses.

5 Q. Generally speaking. And we'll -- if this
6 becomes an issue, we can explore it more. But again,
7 these are some general deposition ground rules that --
8 that I normally like to follow --

9 A. Okay.

10 Q. -- or to give at the beginning of a
11 deposition.

12 So during the deposition, I may ask you to
13 give me an estimate of things. And then you understand
14 that I'm entitled to your best estimate to the extent
15 that you have, you know, personal knowledge?

16 A. Okay.

17 Q. This is a remote deposition. Are there -- are
18 you in front of like a laptop? Desktop? What are
19 you -- what's the environment that you're in?

20 A. I'm on a MacBook Pro.

21 Q. Okay. Are you in your house?

22 A. No, I'm in my -- I'm at the -- I'm in a
23 workspace called the MIT Engine in a conference room.

24 Q. Okay, fair enough.

25 A. There's no one else here.

1 Q. And there's no one else there? Is that what
2 you said?

3 A. That's right.

4 Q. Okay. On your computer, do you have any
5 applications open?

6 A. Yeah, I can click and see. I -- I can close
7 everything except for Zoom, obviously. One second here.
8 This'll take a second.

9 Q. Yeah.

10 A. Okay, let's see. Getting there.

11 Q. Just let me know when you're ready for the
12 next question.

13 A. Yeah, probably like four or five more apps to
14 get out of the way.

15 Q. Yeah.

16 A. Figure this out. Let's see here. Desktop, I
17 can quit that. Done with that. Sorry, I hit the wrong
18 button.

19 Q. Oh, while you're doing this, one thing that I
20 would ask, maybe more for your benefit, the court
21 reporter's writing down everything that you say. So if
22 you, you know, kind of say things under your breath, it
23 will probably be written down, so --

24 A. That's fine.

25 Q. -- just be mindful of that, yeah.

1 A. I don't have anything there that's
2 problematic. So I've got that up. I've got the finder
3 app. I can close that. So at this time, all I have
4 according to this is -- oh, that -- that, turn it off.
5 So on my screen is the Zoom and a finder window that I
6 could close, but it's just the files that are here.

7 Q. Okay. Do you have any files open on your
8 computer?

9 A. No.

10 Q. Okay. I would ask that during the deposition
11 that you not communicate with others.

12 Is that okay?

13 A. Sure. Let me turn my -- not that I would do
14 that, but I'll kind of put my phone on airplane mode.

15 Q. Sure. And if you receive any messages from
16 anyone, will you let me know?

17 A. Sure.

18 Q. Okay. And again, I mean, you know, we're
19 people, so if you get a message from your wife or
20 something about picking up the kids, that's fine. I'm
21 just -- if you could just let me know, we'll just move
22 past it.

23 A. Yeah.

24 Q. And another just basic ground rule, since this
25 is a deposition, it's not quite a normal conversation.

1 So if you could respond to my questions with, you know,
2 yes's and no's as opposed to uh-huh's and huh-uh's, that
3 would be greatly appreciated.

4 Do you understand that?

5 A. I do understand that.

6 Q. Okay, let's see here. Now, you submitted a
7 declaration. Strike that. It's probably easier just to
8 do this. Now, can you let me know what you see on your
9 screen?

10 A. I see a screen share of -- I'm just trying to
11 blow it up -- of the IPR, Exhibit 2002, that appears to
12 be the Declaration of Rajeev Surati.

13 (Exhibit No. 2002, previously marked, was
14 referenced and indexed.)

15 BY ATTORNEY HWANG:

16 Q. Okay, great. So you can see the -- can you
17 see your declaration?

18 A. I can. It's a little hard to read, but that's
19 fine.

20 Q. Okay.

21 A. Because I have a small laptop screen.

22 Q. Do you have any papers around you?

23 A. I do. I had printed out the exhibit, copies
24 of IPR00723 and the -- and the patent, but I can move
25 them if that's what you want.

1 Q. Do you have your declaration around you, like
2 a physical copy?

3 A. Yeah, I do.

4 Q. Okay.

5 A. Right here.

6 Q. Is it marked up in any way?

7 A. No, I just printed it out fresh.

8 Q. Okay, great. And what vendor documents do you
9 have round you --

10 A. I have --

11 Q. -- at your disposal?

12 A. -- the patent.

13 Q. Okay. Anything else?

14 A. No. I can open up documents from the filing
15 if I need to, as I have them on my hard drive --

16 Q. Okay.

17 A. -- if we need to. But if you can -- if
18 there's something you want to send me through this
19 process, I can open those up as well.

20 Q. That's fine. At least for your declaration
21 and the patent, it sounds like you can look at physical
22 copies in front of you in case you can't read something
23 on the screen very well.

24 Is that correct?

25 A. That's correct.

1 Q. Okay.

2 A. And if I need to open up the petition or
3 something, I'll -- I could do that as well if I need to.
4 But I don't have it printed out if I need to zoom in or
5 something, but --

6 Q. Now, Exhibit -- and I think you already said
7 this, but just to make sure, Exhibit 2002 is a copy of
8 the declaration you submitted in IPR2024-00723.
9 Correct?

10 A. That's correct.

11 Q. And if I refer to Exhibit 2002 as your
12 declaration in this deposition, will you know what I'm
13 talking about?

14 A. I will.

15 Q. And if I ask you questions about,
16 quote-unquote, "this proceeding," will you understand
17 that I'm referring to IPR2024-00723?

18 A. I will.

19 Q. If I refer to the Petitioner as Vizio, will
20 you understand what entity I'm referring to?

21 A. Yes, I think so.

22 Q. Okay. If I refer to the Patent Owner as
23 either Multimedia or MMT, will you understand who I'm
24 referring to?

25 A. Yes.

1 Q. The patent-in-suit in this proceeding is
2 9,578,384. Correct?

3 A. That's correct.

4 Q. If I refer to that patent the '384 patent,
5 will you understand what I'm referring to?

6 A. Yes, that works for me. That -- sorry. Yes,
7 that works for me.

8 (Exhibit No. 1001, previously marked, was
9 referenced and indexed.)

10 BY ATTORNEY HWANG:

11 Q. Okay. And just for the record, I believe
12 that's Exhibit 1001, but I'll probably refer to the
13 patent number instead of 1001. Will you understand what
14 I'm talking about when I do that?

15 A. Yes, sir.

16 Q. And you're being compensated at a rate of \$665
17 per hour for your work in this proceeding.

18 Is that correct?

19 A. That's correct.

20 Q. Now, I know that you've been involved in other
21 proceedings for MMT. For example, in IPRs involving LG.

22 First, is that a fair statement?

23 A. That's a true statement.

24 Q. Was your rate the same in those proceedings?

25 A. I believe that's correct.

1 Q. And how many IPRs did you handle on behalf of
2 MMT where LG was the Petitioner?

3 A. You know, I really have never looked at that
4 issue. I was just told there are IPRs to answer, and I
5 haven't really paid attention. I could go look back at
6 them and tell you, but I just don't know off the top of
7 my head.

8 Q. Do you have an estimate? Like less than 10?
9 Less than five?

10 A. I think I've been involved with one, two,
11 three, four, five. I just opened up my finder to see
12 what I for IPRs. I have five IPRs that I list.

13 Q. Okay.

14 A. And I'm guessing that a few of them might be
15 Vizio, a few of them might be LG. But honestly, I
16 don't -- I haven't really spent a lot of time looking at
17 who was the Petitioner.

18 Q. Sure. Aside from matters involving Vizio and
19 LG, have you worked for MMT in other matters?

20 A. No. I mean, I'm -- I was engaged to work on
21 LG and M -- and Multi -- sorry, LG and Vizio's District
22 Court case and these IPRs.

23 Q. Okay. And have you worked with the attorneys
24 representing MMT and the IPRs before?

25 A. So I just recently, or sort of concomitantly

1 they asked me to work on a totally unrelated matter, but
2 I -- and I -- I've been working a little bit on that but
3 I just got started on it.

4 Q. Fair enough.

5 And that was after you were retained for this
6 proceeding?

7 A. That's correct.

8 Q. Okay. Are you an expert -- strike that.

9 Are you providing any expert opinions in the
10 underlying litigation matters involving LG or Vizio?

11 ATTORNEY YANG: Object to scope.

12 A. Yeah, I mean, I'm just involved in a case that
13 I'm going to trial with LG. I don't recall the status
14 of my engagement with regard to Vizio, but I think --
15 I -- it's -- honestly, I don't -- like, I know for sure
16 on LG. With Vizio, I'm not completely sure.

17 BY ATTORNEY HWANG:

18 Q. Okay. For LG, what is the, generally
19 speaking, your role in the LG matter?

20 A. I am, like in this case, providing opinions on
21 invalidity.

22 Q. How about infringement?

23 A. No.

24 ATTORNEY YANG: Object to scope.

25 A. Sorry. I -- I'm just being asked to work on

1 invalidity as of now.

2 BY ATTORNEY HWANG:

3 Q. Approximately how much have you invoiced so
4 far with respect to this proceeding?

5 A. So the -- this particular IPR?

6 Q. Sure.

7 A. So I actually haven't created an invoice for
8 this. I was planning to after today.

9 Q. Okay, let me rephrase the question.
10 How many hours have you spent on this
11 proceeding?

12 A. Oh, okay. Something like maybe 16.

13 Q. And how many hours have you spent -- did you
14 spend working on your expert report? Or your expert
15 declaration. I should say.

16 A. So I would say that's like 10 maybe.

17 Q. And did you write your declaration?

18 A. So the declaration was jointly constructed
19 with counsel, but ultimately, all the opinions in the
20 report are mine.

21 Q. And your declaration includes some claim
22 construction opinions. Correct?

23 A. There are, yes.

24 Q. Did you come up with the claim constructions
25 yourself?

1 A. I believe they were provided by the
2 institution board.

3 Q. The institution board provided the proposed
4 constructions in your declaration?

5 A. Well, I used what they said those terms mean
6 in their decision.

7 Q. Is it your understanding that the -- the board
8 in this proceeding provided a construction about the
9 phrase "providing either a detail view or digest view of
10 VOD content"?

11 ATTORNEY YANG: Object to form.

12 A. Yeah, I just -- I just took the words -- well,
13 let's just look at my report. So I -- just give me a
14 second, okay?

15 ATTORNEY HWANG: And while you look, for the
16 court reporter, if I say "VOD," it's an acronym, so just
17 V-O-D, which together stand for video on demand.

18 A. I guess what I would say is, paragraph 54, I
19 say: I understand that for the purposes of the
20 institution stage, the board found there was no need to
21 provide express constructions of any claim terms.
22 However, I also understand the board preliminary
23 determined that a detail view presents information about
24 a selected item of the VOD content, and a digest view
25 presents information about a set of VOD content that are

1 associated with a series. My analysis is consistent
2 with these determinations. And then --

3 BY ATTORNEY HWANG:

4 Q. You provide claim constructions that were --
5 well, strike that.

6 You provide proposed claim constructions in
7 your declaration. Correct?

8 ATTORNEY YANG: Object to form.

9 A. I'm simply using what I understood they wrote
10 down in their -- in their institution decision as how
11 they took the words to mean when they were making the
12 decisions, and I've applied that. So if -- inasmuch as
13 that is considered a claim construction, I guess that --
14 that would be what I was using to apply to my
15 definitions in this -- in this report.

16 BY ATTORNEY HWANG:

17 Q. If you go to your declaration, Table of
18 Contents I, and it should be on the screen, it says that
19 section, what is it, section 5 is for claim
20 construction. Correct? Starting at page 18.

21 A. No, I see section 6 for claim construction.

22 Q. Oh, I'm sorry. So section 6?

23 A. Was that a trick question? Sorry. Yeah,
24 section 6.

25 Q. Okay. Section 6 relates to claim

1 construction. Correct?

2 A. Yeah.

3 Q. And you provide opinions about the claimed
4 order of steps. Correct?

5 A. Yes.

6 Q. Were those opinions -- did you arrive at those
7 opinions by yourself or were they provided to you?

8 ATTORNEY YANG: Object to form.

9 A. Yeah, I mean, I just would say that it was a
10 topic of discussion. And as part of that discussion and
11 writing this report, we, you know, we -- I -- we and
12 then I decided that was important thing to say, having
13 read the order of steps. Or, sorry, having read the
14 claim at issue.

15 BY ATTORNEY HWANG:

16 Q. Okay, I'll move to strike. And again, I just
17 want to kind of, since we're just starting --

18 A. Uh-huh.

19 Q. -- I want to make sure that we're, you know,
20 starting off on the right foot. I want to make sure
21 you're answering the questions that I ask because I'm
22 entitled to that.

23 A. Oh, sure.

24 Q. Did you arrive at the opinions regarding the
25 claimed order of steps by yourself?

1 A. No, I think --

2 ATTORNEY YANG: Object to form.

3 A. Yeah, I -- as I said, we discussed it so
4 obviously, there's more than myself and -- in that
5 process. But ultimately, that's my opinion.

6 BY ATTORNEY HWANG:

7 Q. And then "we," meaning your -- the attorneys?

8 A. Yeah.

9 Q. Same thing. Same question for providing
10 either a detail view or digest view of VOD content. Did
11 you arrive at your opinions by yourself or with the
12 assistance of counsel?

13 A. Again --

14 ATTORNEY YANG: Object to form.

15 A. Again, same answer.

16 BY ATTORNEY HWANG:

17 Q. Did you prepare for today's deposition?

18 A. I did.

19 Q. How much time did you spend preparing?

20 A. So I spent about 6 hours preparing.

21 Q. So earlier, you said you estimated -- you gave
22 me an estimate that you spent about 16 hours on this
23 proceeding so far. Is that more or less accurate?

24 A. Yeah, so that means 10 plus 6 is 16.

25 Q. Okay. And so the 10 hours that you provided

1 me before with respect to drafting your declaration,
2 that included reviewing all the materials.

3 Is that correct?

4 A. I reviewed as much as I needed to, yes.

5 Q. Okay. In the 10 hours. Correct?

6 A. That's correct.

7 Q. Did the attorneys provide you with a first
8 draft of your declaration?

9 ATTORNEY YANG: Object to form.

10 A. Well, we had discussions about it before they
11 provided a draft, but in terms of was there a physical
12 copy of what you -- what -- what -- an initial copy of
13 that delivered to me initially? Yes, but we had
14 discussions about it beforehand.

15 BY ATTORNEY HWANG:

16 Q. And what documents did you review to prepare
17 for today's deposition?

18 A. Let's see, I looked at the videos. I looked
19 at the patent. I looked at the institution decision. I
20 looked at Dr. Houh's deposition testimony. I looked at
21 Dr. Houh's report. I'm just trying to think of what
22 else I looked at. And then some of the patents that are
23 referred, like parts of the patents. And I can't think
24 of anything else off the top of my head. If it comes to
25 me, I'll let you know.

1 Q. And those were all reviewed to prepare for
2 today's deposition. Is that correct?

3 A. That's correct.

4 Q. Okay. So I'm looking at page 3 of your
5 declaration. Do you see it on the screen?

6 A. Yeah.

7 Q. And it includes a table. I think the heading
8 is Petitioner Materials Considered.

9 Do you see that?

10 A. I do.

11 Q. Are there any documents that you reviewed with
12 respect to this proceeding that are not identified in
13 this table?

14 A. I don't think so. But if there's something in
15 the document that's not listed, then it should be
16 included. But as far as I know, these are things that I
17 thought were relevant for writing this declaration.

18 Q. Okay. I want to take that last answer in
19 pieces. Did you review Dr. Houh's declaration?

20 A. Yes, I did.

21 Q. And Dr. Houh has several exhibits. Correct?

22 A. He does.

23 Q. And many of those exhibits are not listed on
24 page 3 of your declaration. Correct?

25 A. Yeah, I think that's fair. But I would say

1 that as part of the declaration, there are a number of
2 examples that you gave -- that he's given, and I've
3 reviewed his -- his declaration. And in that sense,
4 I've looked at other -- parts of other documents as
5 would have been included in the declaration of Dr. Houh
6 in his exhibits as much as I needed to to write this
7 report.

8 Q. How did you -- well, strike that.

9 Did you review all of the exhibits to
10 Dr. Houh's declaration?

11 A. For this? You're asking for this -- for this
12 deposition?

13 Q. For this proceeding in general.

14 A. Oh. I looked at a number of them. I don't
15 know I looked at all of them because he has a background
16 section that has a number of different things where he
17 talks about the background. And a number of the things,
18 I'm familiar with, because I studied at the same time at
19 MIT with Dr. Henry Houh so I was kind of familiar with
20 some of the things he mentioned and that he wrote.

21 So I don't know that I -- I just took it for
22 granted that I knew he worked on certain things so I
23 didn't necessarily review things where he was like oh,
24 here's the first web thing that I did with videos and
25 things like that.

1 Q. Okay. So would it be fair to say that you did
2 not review all the exhibits to Dr. Houh's declaration in
3 this proceeding?

4 A. I would say that I did not review all the
5 exhibits related to the background in this proceeding.

6 Q. Did you review the preliminary response that
7 was filed by the Patent Owner in this proceeding?

8 A. I did look at it. Are -- are you asking about
9 the petition, or what are you asking about?

10 Q. So there is a petition. Correct?

11 A. Right.

12 Q. Following the petition, the Patent Owner filed
13 a preliminary response.

14 Are you aware of that?

15 A. I'm not sure I am.

16 Q. Okay. So would it be fair to say that you did
17 not review the preliminary response that was filed by
18 the Patent Owner in this proceeding?

19 A. I don't believe I have. If -- if it's -- if
20 it's something that's part of this list of documents,
21 then I probably did, but I don't have a recollection
22 having done that.

23 Q. And so would it be fair to say that you did
24 not consider any positions taken by MMT included in the
25 preliminary response for this proceeding?

1 A. No, I did not.

2 Q. Did you review any documents relating to the
3 lawsuit between MMT and Vizio not listed in paragraph 9
4 of your declaration?

5 A. For this proceeding?

6 Q. For this proceeding.

7 A. Definitely not.

8 Q. Have you reviewed any infringement contentions
9 from any litigation matters involving the '384 patent?

10 A. I don't believe I have looked at any
11 infringement contentions.

12 Q. That would be from either the LG matter or the
13 Vizio matter. Correct?

14 A. Yeah. I don't believe I've ever been sent
15 them or reviewed them.

16 Q. Would it be fair to say that you did not
17 consider MMT's positions included in MMT's infringement
18 contentions from any lawsuits in forming your opinions
19 for this proceeding?

20 A. I don't believe so.

21 (Exhibit No. 1003, previously marked, was
22 referenced and indexed.)

23 BY ATTORNEY HWANG:

24 Q. I'm sharing another document with you. And
25 let me know when you see the new document.

1 A. This is Dr. Houh's opinion, or his -- his
2 declaration in support of the petition.

3 Q. Right. So you do see Exhibit 1003 on your
4 screen. Correct?

5 A. I do.

6 Q. And in Dr. Houh's declaration in paragraph 3,
7 he lists a number of documents and materials that he
8 reviewed for this proceeding.

9 Is that a fair statement?

10 A. Yeah.

11 Q. How did you decide what documents to review
12 and what documents not to review that are listed in
13 paragraph 3 of Dr. Houh's declaration?

14 A. Okay, sorry. Can we just start here?

15 Q. Yeah, that's fine.

16 A. And go backwards one page. Backwards one more
17 page. So on B, I did -- I mean, I did look at it, but I
18 didn't -- it wasn't -- I wouldn't say it was a
19 substantive part of my -- of my response. So part of
20 this is I looked at what I was responding -- what I felt
21 I could respond to as problematic with this thing, and I
22 looked at things that were relevant to that. But that's
23 at least -- it's at least that.

24 Q. Anything else?

25 A. Can you keep on going down? I mean, if it's

1 listed, obviously, I saw it. If it's listed in my
2 deposition, it's what I saw, uh-huh.

3 Q. All right. And again, just to clarify the
4 question, how did you decide what documents to review or
5 not review?

6 A. Right. I'm just -- yeah, I understand that.
7 I'm just trying to -- like, I gave you what my initial
8 response is, and I'm just going through this list to try
9 to go look and see. I see what you're saying. Yeah, I
10 was looking at what I felt were his arguments, what
11 arguments he made and how he supported them and which
12 arguments I wanted to provide. And I gave you specific
13 opinions with regard to -- I was asked to provide
14 opinions about certain aspects of it, and this is -- my
15 opinions are limited to what I wrote in the -- in my
16 declaration.

17 Q. I'll move to strike as nonresponsive.

18 Again, it's not a trick question, but just how
19 did you decide whether to review a document or not in
20 preparation?

21 A. Yeah, so I --

22 ATTORNEY YANG: Object to form.

23 A. Yeah, I'm just trying to say, look, I -- I
24 looked at the report. I looked at things that I thought
25 were things that I disagreed with, and then I looked to

1 answer the things and looked at this list and decided,
2 based on what I read, what I thought was relevant, what
3 he wrote, and what I thought was relevant. Does that
4 answer your question or is that not enough?

5 BY ATTORNEY HWANG:

6 Q. How did you decide that a document was not
7 relevant to the inquiry before reviewing the document
8 itself?

9 ATTORNEY YANG: Object to form.

10 A. Well, if it had to do with background, I
11 didn't really know that it was necessary. And then if
12 it had to do with particular parts of the claim, then I
13 didn't see it relevant.

14 You know, this is an IPR proceeding. It's
15 what the -- what the Patent Owner has said. I -- that's
16 basically what I would say is that I would say that
17 that's how I looked at this and said I'll give my
18 opinion on these things. I didn't write these
19 contentions. My opinion is independent of what MMT may
20 or may not have said before, and that's how I made my
21 opinion. I felt I could make an argument based on the
22 facts that I was given and various decisions that were
23 made, what was said about things, and so that's how I
24 made my decision what to review.

25 BY ATTORNEY HWANG:

1 Q. Okay, let me ask it this way. The videos
2 involved in this IPR include demonstrations of Netflix.

3 Is that fair statement?

4 A. Sure.

5 Q. Okay. Are you familiar with Netflix?

6 A. I am familiar with Netflix.

7 Q. Have you watched videos on Netflix before?

8 A. I have.

9 Q. Do you have a Netflix subscription?

10 A. I do.

11 Q. Okay. So many of the documents in the
12 background section relate to Netflix. Is that a fair
13 statement? I'll stop there.

14 ATTORNEY YANG: Object to form.

15 A. Yeah, I would say that, you know, we could go
16 through this list and pick out each one that I thought
17 had to do with Netflix, but there was certainly -- the
18 videos related to Netflix, there were several, and I --
19 I did look at them.

20 BY ATTORNEY HWANG:

21 Q. Okay. And I'm just -- we'll get there. But
22 you had a prior knowledge of Netflix before being
23 involved in this proceeding. Correct?

24 A. So, yeah. So I -- I think -- I think if you
25 were to ask me if I used some of my prior knowledge and

1 understanding of Netflix to kind of help me maybe look
2 at what's going on, sure. I -- I understood that it was
3 a service that you would use on a TV, a smart TV. I
4 have a smart TV with Netflix on it. In fact, it may be
5 a Vizio TV. I don't know.

6 But the point is that I accepted that a Vizio
7 TV has Netflix on it, and I saw examples of it being
8 shown. And I've used Netflix. I mean, I think I used
9 Netflix on a Vizio TV last night.

10 Q. When was the first time that -- approximately
11 when was the first time that you used Netflix on a -- on
12 any device, actually?

13 A. That's a good question. I would say within
14 one or two years of the founding of Netflix is my guess,
15 but I couldn't be sure.

16 Q. Well, approximately what year would that be,
17 in your mind?

18 A. I actually don't know. That's what I'm trying
19 to say.

20 Q. Yeah.

21 A. I used it early on, but I don't remember. I
22 mean, Netflix was -- I definitely used the service where
23 you got DVDs delivered, and then I would have -- I had
24 high bandwidth and then I would have used it. I don't
25 know -- I probably would have used it on a browser

1 before TV.

2 Q. Oh, so you used Netflix services when their
3 business model was primarily providing, I would say, you
4 know, movies through the mail, something like that.

5 Is that a fair statement?

6 A. Yeah. So I was a member then, so --

7 Q. And then they kind of shifted over to
8 providing video on demand content through applications.
9 Correct?

10 A. I think that's correct.

11 Q. And then you were using Netflix, you know,
12 early on when they -- when they made that shift.
13 Correct?

14 A. I think that's correct.

15 Q. And again, I just want to know your
16 familiarity with the technology involved because that
17 will help me craft my questions later.

18 A. Okay.

19 Q. It sounds like you're -- would it be a fair
20 statement -- strike all that. Here's the question.

21 Would it be a fair statement to say that you
22 are familiar with how to use a Netflix application?

23 A. I think so.

24 Q. Would it be a fair statement to say that you
25 were familiar with how to use the Netflix application in

1 2012?

2 ATTORNEY YANG: Object to form and foundation.

3 A. I mean, I would say that the video -- I mean,
4 I based -- I -- I have a -- an understanding of it, but
5 when I looked at these particular things, I looked to
6 the videos that had more particular instantiations of
7 that to -- you know, because these interfaces change
8 over time.

9 BY ATTORNEY HWANG:

10 Q. Okay, I'll move to strike. Again, I'm just
11 trying to get some basic information because it's really
12 laying the foundation.

13 So you're familiar with how to use Netflix
14 today. Correct?

15 A. Yes.

16 Q. And were you familiar with how to use Netflix
17 let's say 10 years ago?

18 A. Yes.

19 Q. And probably even before then, based on your
20 question -- or your answers before. Correct?

21 A. I think that's correct.

22 Q. Now, in paragraph 9 of your declaration, you
23 identify TechnoBuffalo and TechnoBuffalo ii videos.

24 Does that sound familiar?

25 A. Yeah.

1 Q. And right now, just so the -- just for the
2 record, I went back to showing Exhibit 2002. Do you see
3 that? Which is your declaration.

4 A. Yeah. I started looking off the page, but
5 yeah, sure, that -- I see that.

6 Q. Did you watch both TechnoBuffalo videos before
7 drafting your declaration?

8 A. I did.

9 Q. So you were familiar with the content of both
10 videos?

11 A. I believe so.

12 Q. And then did you -- sorry, go ahead.

13 A. And then I notated particular sections that I
14 thought were relevant in the declaration.

15 Q. And then you watched both videos to prepare
16 for the deposition today.

17 Is that correct?

18 A. I watched portions of them, but I was more
19 particular about the timestamps that I'd put in the
20 declaration.

21 Q. How about the missing remote video? Did you
22 review that before drafting your declaration?

23 A. I did.

24 Q. And did you review the missing remote video to
25 prepare for today's deposition?

1 A. I -- I think I just looked at the relevant
2 portions.

3 Q. Approximately how much time did you spend
4 reviewing all of the videos at issue in this IPR to
5 prepare for today's deposition?

6 A. I would say, you know, the way that they're
7 set up is there's like 14 -- I don't know, there's like
8 10 different things. And I downloaded all 10 and kind
9 of skimmed through them for the TechnoBuffalo stuff. I
10 can't recall with missing remote just because of that
11 two-minute limitation.

12 So I would just say I probably spent a half an
13 hour, you know, like 20 minutes to a half an hour
14 looking at these things. And even though they're not
15 that long -- I mean, they're -- they're longer than --
16 you know, there's -- there's some length to them, I was
17 looking for particular portions related to Netflix.

18 Q. Actually, something that you said, just to
19 again paint an accurate picture here, did you watch the
20 videos from YouTube directly?

21 A. Well, there are these links, right? And for
22 the -- for the -- so I did -- I did at one point look at
23 the YouTube things, but then there are also the ones
24 that got submitted. So I looked at the submitted ones
25 when I was looking at preparing for the declaration.

1 Q. I see. So you're looking at downloaded files
2 of the videos when you're preparing for the -- the
3 deposition?

4 A. Yeah, just because I was there, so I was like
5 let's download them all.

6 Q. I see. Where did you download the materials
7 from?

8 A. So first I went to Alarm Docket, where I have
9 a subscription, and it failed to give me the MPEG files.
10 And then I went to the PTAB Office, typed in the numbers
11 and used that. It was more -- it was partially because
12 I was curious. I'd never seen MPEGs uploaded for this
13 purpose before so I was actually kind of interested to
14 see if -- what would happen.

15 Q. Would it be fair to say that the TechnoBuffalo
16 videos included a demonstration of a Vizio TV using the
17 Netflix application?

18 A. Yeah.

19 Q. Did you understand how Netflix functioned as
20 shown in the TechnoBuffalo videos?

21 A. I believe so.

22 Q. I'll be honest with you. Some -- for -- for
23 what it's worth, some experts are older and not quite
24 familiar with some of the -- the technology so before
25 the deposition, I didn't know what familiarity you had.

1 But it sounds like you -- you know Netflix pretty well,
2 so --

3 A. I think my mom knows it pretty well.

4 (Reporter clarification.)

5 THE WITNESS: I just -- that's why I have her
6 on my account.

7 ATTORNEY HWANG: I think the witness is just
8 saying his mom is also on his Netflix account.

9 BY ATTORNEY HWANG:

10 Q. Is that fair?

11 A. That's fair.

12 Q. Okay.

13 A. Sorry.

14 Q. Do you have kids?

15 A. I do.

16 Q. Do they use Netflix in your household?

17 A. Oh, yes.

18 Q. Okay. How old are your kids?

19 A. 16 and 13. And they each have their own name
20 with a, quote, "account" associated with it or an
21 account with their name on it.

22 Q. And I'm assuming you pay for their access.
23 Correct?

24 A. Yeah, but it's, like, you pay for one thing
25 and you have like four or five different profiles.

1 Q. Again, I may be beating a dead horse, but you
2 sound pretty familiar with Netflix so I'll move on.

3 A. Okay.

4 (Petition in this matter was referenced and
5 indexed.)

6 BY ATTORNEY HWANG:

7 Q. I'm going to show you the petition in this
8 IPR.

9 A. Okay.

10 Q. Do you see it on your screen?

11 A. Uh-huh.

12 Q. Based on what you've said, the next few
13 questions might be pretty basic for you, but --

14 A. Uh-huh.

15 Q. -- again, I don't want to assume anything. So
16 let's go to page 32 of the petition.

17 Do you see page 32?

18 A. I do.

19 Q. Do you see the image at the bottom of page 32?

20 A. I do.

21 Q. And it's an image from one of the
22 TechnoBuffalo videos. Correct?

23 A. That's correct.

24 Q. And it shows the Netflix application.
25 Correct?

1 A. It does.

2 Q. And do you understand that this image was
3 taken from -- it looks like the timestamp is 32 seconds
4 into the video.

5 Do you see that?

6 A. Where do you see the 32 seconds?

7 Q. Just at the bottom left of the actual screen
8 shot, it says 32:12:38.

9 A. If that's what it says, I mean, that's what it
10 says. I can't possibly read what's there. If you zoom
11 in, I could.

12 Q. Okay. Again, I just want to get your
13 understanding of --

14 A. I know. Yeah, I'm sure -- yeah that's still
15 quite -- there we go.

16 Q. I can zoom in here. There, do you see that
17 better now?

18 A. Yeah, that makes sense.

19 Q. Okay. And again, this is just foundation,
20 seeing if you understand what's going on. You never
21 know. Sometimes the experts don't.

22 So again, the question is you see the image
23 from the screenshot from Netflix. Correct?

24 A. I do.

25 Q. And then from here, from this menu on page 32

1 of the petition, the user could go up and down through
2 the menu choices. Correct?

3 A. Yes.

4 Q. So the user could go to Suggestions For You,
5 scroll down, New Arrivals, Genres, etc. Correct?

6 A. That's correct.

7 Q. And for this screenshot, New Arrivals is
8 highlighted. Correct?

9 A. Right.

10 Q. And then the New Arrivals would have movies
11 and TV shows. Correct?

12 A. Yeah.

13 Q. I'm on page 33 of the petition.

14 Do you see that?

15 A. I do.

16 Q. Do you see the menu from the Apple TV device
17 for Netflix on page 33 of the petition?

18 A. I do.

19 Q. Same question here again. Just to confirm
20 that you understand how the app works, a user could go
21 up and down from those menu items from this -- this user
22 interface. Correct?

23 A. That's what I recall, looking at this and
24 reading it, and this is what -- this is what -- another
25 example given.

1 Q. I'm on page 35 of the petition.

2 A. Yeah.

3 Q. Now we see a screenshot of Netflix on the
4 Vizio TV, and the timestamp is 47 seconds. Is that --

5 A. You'd have to zoom in for me to verify that.

6 Q. Okay. So I zoomed in, I guess.

7 A. I see it. Sorry. 47 seconds, yeah. So
8 that's a collection view, I think.

9 Q. And to get to this view, the user selected
10 Genres. Correct?

11 A. That's what I understood, I think. Yeah, they
12 selected Genres. It looks like there's a -- a ghost
13 version of that on the left.

14 Q. Again, I just -- I just need to know if you
15 know --

16 A. Yeah.

17 Q. -- what's going on here.

18 A. Yeah. So they selected Genres, and that
19 appears to be what -- there's a Television Genre,
20 there's an Action/Adventure Genre, and you can scroll to
21 get more.

22 Q. So the first row of content would include
23 television shows. Is that a fair statement?

24 A. Yes, sir.

25 Q. And the second row of content includes at

1 least one or more movies. Correct?

2 A. I think that's right.

3 Q. And a user could select either a television
4 series or a movie from this interface shown on page 35
5 of the petition. Correct?

6 A. I think that's correct.

7 Q. Okay, let's go to page 41 of the petition.

8 A. Uh-huh.

9 Q. I'll zoom in. Do you see another screenshot
10 from one of the TechnoBuffalo videos?

11 A. Yeah.

12 Q. And it looks like this timestamp is 1 minute
13 and 3 seconds.

14 Do you see that?

15 A. Yeah.

16 Q. This is a screen that would be displayed if
17 The Office was selected from the user interface that we
18 just looked at. Is that a fair statement?

19 A. I think so.

20 Q. And this menu has selectable menu items to
21 play episode 1. Is that a fair statement?

22 A. It does.

23 Q. And if user made a selection to play episode
24 1, a viewer could be used to actually watch that
25 episode. Is that an accurate statement?

1 A. Yes.

2 Q. And that episode could be viewed by the user
3 using a player view. Is that a fair statement?

4 A. I think so.

5 Q. After watching an episode of The Office, the
6 user could go back to the view that we previously looked
7 at on page 35 of the petition. Correct?

8 A. Could you repeat that?

9 Q. Yeah, so let me break it up into pieces.

10 A user could watch an episode of The Office --

11 A. Okay.

12 Q. -- based on what you see on page --

13 A. 41.

14 Q. -- 41 of the petition. Correct?

15 A. I agree.

16 Q. And then after watching that episode, a user
17 could go back to the view that's shown on page 39 of the
18 petition. Correct?

19 ATTORNEY YANG: Object to form and foundation.

20 A. I think it's possible to get back to that
21 screen, yeah.

22 BY ATTORNEY HWANG:

23 Q. And then from the screen on page 39 of the
24 petition, the viewer could then select another piece of
25 content that the user wanted to watch. Correct?

1 A. Sure.

2 Q. So in other words, Netflix operates where you
3 can go backwards and forwards between these menu items.
4 Correct?

5 ATTORNEY YANG: Object to form and foundation.

6 A. Yeah. I mean, I would say that you can -- I
7 mean, I -- back and forth could include several steps.
8 But if you were on the player, you could somehow get
9 back to that -- the image you're showing here. I
10 believe that's correct. And that you could then
11 subsequently selected a new piece of content.

12 BY ATTORNEY HWANG:

13 Q. And when you say "the image that you're
14 showing here," you're looking at page 39 of the
15 petition. Correct?

16 A. Yeah.

17 Q. Again, since it's a deposition and it just --
18 we just need to make everything express so everyone
19 knows what's going on.

20 A. That's fair.

21 THE WITNESS: It's coming up on about 54
22 minutes or something. Is it possible for me to take a
23 break?

24 ATTORNEY HWANG: Yeah, let me -- I'm almost --

25 THE WITNESS: Oh, okay.

1 ATTORNEY HWANG: -- done here. I might have a
2 couple more questions.

3 THE WITNESS: Okay.

4 BY ATTORNEY HWANG:

5 Q. So we went through an example where we -- the
6 user was able to watch an episode of The Office.
7 Correct?

8 A. Yes.

9 Q. Generally speaking?

10 A. I think that's fair.

11 Q. And then now if the user went back to the menu
12 that's shown on page 39 of the petition, the user could
13 then select Bad Company to be viewed. Correct?

14 ATTORNEY YANG: Object to form and foundation.

15 A. Sure. I think it's fair to say that this Bad
16 Company movie -- I mean, I don't -- I think it's a
17 movie. You could select it from the screen.

18 BY ATTORNEY HWANG:

19 Q. And then once that movie is selected, a
20 different view would be presented to the user. Correct?

21 A. That's correct.

22 Q. And then the user could make a selection to
23 watch that movie. Correct?

24 A. I think that's correct.

25 Q. That's generally how -- if -- strike that.

1 Is that all generally consistent with your
2 experience using Netflix watching VOD content?

3 A. That a -- a new screen would pop up and from
4 there, you could play it?

5 Q. Sure.

6 A. Yeah, I think that's generally true.

7 ATTORNEY HWANG: You know what? We can take a
8 break now.

9 THE WITNESS: Thanks.

10 ATTORNEY HWANG: Five minutes?

11 THE WITNESS: Give me seven and a half.

12 (Recess taken.)

13 BY ATTORNEY HWANG:

14 Q. Before I ask you more questions, did you
15 communicate with anyone during the break?

16 A. I did not.

17 Q. And then have you opened up any new
18 applications since we started the deposition?

19 A. No.

20 Q. Am I sharing the screen with you?

21 A. I don't see one.

22 Q. Okay, let me try and pick up where we left
23 off. Let me ask you this first. If I refer to the
24 missing remote video in this deposition, will you know
25 what exhibit I'm talking about?

1 A. I think that's Exhibit 18.

2 Q. You'll know what video I'm talking about,
3 though. correct?

4 A. Yeah, I will, uh-huh.

5 Q. I believe the exhibit is 1018.

6 A. Yeah, sorry.

7 (Exhibit No. 1018, previously marked, was
8 referenced and indexed.)

9 BY ATTORNEY HWANG:

10 Q. Did you watch the missing remote video all the
11 way through to prepare for this deposition?

12 A. This is the one with the Apple TV with
13 Netflix? Yeah, I believe so. But for the deposition I
14 looked at just select portions.

15 Q. And would it be fair to say that you know how
16 Netflix worked as shown in the missing remote video?

17 A. I think so.

18 Q. And again, some of this stuff you've already
19 kind of informally answered. But the missing remote
20 video shows a demonstration of the Apple TV device using
21 Netflix. Correct?

22 A. Yes, sir.

23 Q. You know, it helps that you have -- I'll just
24 ask it anyway. You're familiar with how Netflix works
25 in general. Correct?

1 A. Uh-huh.

2 ATTORNEY YANG: Object to form.

3 A. Generally speaking, it's an application that
4 runs that allows you to do VOD, select VOD content that
5 a subscriber would have. So that's, generally speaking,
6 how I view it.

7 BY ATTORNEY HWANG:

8 Q. Okay. And just for the record, I want to
9 verify that you understand how Netflix worked on the
10 missing remote -- as used in the missing remote video so
11 I'll ask you a few questions about that. Is that okay?

12 A. Okay.

13 Q. Do you see page 36 of the petition on the
14 screen or am I sharing it?

15 A. No, I can't see it.

16 Q. Okay, let me share real quick. Okay, do you
17 see the petition on your screen?

18 A. Yep.

19 Q. So the image on the top is from timestamp 21
20 seconds into the video.

21 Do you see that?

22 A. If that's what it says. If you'd just zoom
23 in, I could verify that. Yep, uh-huh.

24 Q. Now, a user could scroll up and down in this
25 menu to select different, you know, categories of

1 content to view. Is that fair statement?

2 A. I think that's fair.

3 Q. And then if a user selected Recently
4 Watched --

5 A. Uh-huh.

6 Q. -- as shown on the top, then a different menu
7 as shown on the bottom of page 36 would appear on the
8 screen. Is that a fair statement?

9 A. I think that's fair.

10 Q. And then the image on the bottom of page 36 of
11 the petition shows different items of VOD content that
12 could be selected by the user. Correct?

13 A. Yes.

14 Q. If the user selected, for example, Parks and
15 Recreation --

16 A. Uh-huh.

17 Q. -- then a screen like the one shown on page 44
18 of the petition would show up on the screen. Correct?

19 A. That's correct.

20 Q. And then from the image on page 44 of the
21 petition -- actually, before I ask that, the image on
22 page 44 of the petition, that's at timestamp 1 minute
23 and 54 seconds. Is that fair?

24 A. I think that's fair, because I can see the
25 text.

1 Q. Okay. Again, because it's a deposition, I
2 just want to kind of paint a picture of what you're
3 seeing.

4 So from the image on page 44 of the petition,
5 a user could select a particular episode to watch and
6 then watch that episode. Correct?

7 A. I believe that's correct.

8 Q. And then after watching that episode, the user
9 could go back to the menu, either of the menus on page
10 36 of the petition. Correct?

11 ATTORNEY YANG: Object to form and foundation.

12 A. Yeah, I would just say that as I typically
13 understand how Netflix works, and that there's maybe a
14 back button, you could do what you just described.

15 ATTORNEY HWANG: Okay. And I would counsel --
16 this is more for your counsel. Objection to form is
17 appropriate, but -- and again, this is kind of laying
18 the foundation for later in the deposition. Foundation
19 is not. If you object to the scope or form, that's
20 fine.

21 ATTORNEY YANG: You don't need a foundation
22 for the questions you're asking so I'll continue making
23 that objection. If you want to call the board on this
24 issue, I'm happy to do that.

25 ATTORNEY HWANG: Well, the record is clear, so

1 the board can see your objections. There's no need to
2 call, but I think we would both agree that speaking
3 objections and coaching the witness is improper.
4 Correct?

5 ATTORNEY YANG: And I disagree that that's a
6 speaking objection. So if you want to call the board
7 and ask them if this is a speaking objection, go ahead.

8 ATTORNEY HWANG: Okay. So that's your
9 position to the board. I mean, they're going to read
10 all this, so --

11 ATTORNEY YANG: Yeah, that's fine. I don't
12 think I've been making speaking objections. I didn't
13 make any objections like asked and answered or anything.

14 ATTORNEY HWANG: Okay. All right.

15 BY ATTORNEY HWANG:

16 Q. So going back to page 36 of the petition,
17 after watching an episode of Parks and Recreation, the
18 user could then select another piece of VOD content to
19 watch from the menus on page 36 of the petition.
20 Correct?

21 A. I think it's possible.

22 Q. A user could go -- strike that.

23 A user could freely go back and forth between
24 the menus that you've just seen. Correct?

25 ATTORNEY YANG: Object to form, scope, and

1 foundation.

2 A. I think it's possible to navigate between
3 those screens to do what you described.

4 BY ATTORNEY HWANG:

5 Q. You watched the missing remote TV video.
6 Correct?

7 A. Uh-huh.

8 Q. Isn't it fair to say that the -- the person --
9 the video demonstrated that occurring in the video?

10 A. I'd have to go back and look again to see, but
11 I think that's probably right.

12 Q. Do you have any reason to dispute that? I
13 could show you the video, but I just want to cut to the
14 chase here.

15 A. Yeah, I don't -- I don't think so.

16 Q. Now let's go to your declaration. What do you
17 see on your screen?

18 A. I see a list of content.

19 Q. Would it be fair to say that you're being
20 shown page 3 of your declaration? I just want to make
21 sure we're on the same page here.

22 A. Yeah, I think so, because it says Petitioner
23 and Exhibit 2002.

24 Q. Okay.

25 A. Oh, I see. Okay.

1 Q. Again, I think we're seeing the same thing, I
2 just want to verify.

3 A. Yeah.

4 Q. Do you see paragraph 66 of your declaration on
5 the screen?

6 A. Yep.

7 Q. And in paragraph 66, you provide an opinion
8 about how the phrase "providing either a detail view or
9 a digest view of VOD content" should be construed.

10 Is that fair statement?

11 A. I think so.

12 Q. And then the proposed construction maintains
13 the phrase "providing either" at the beginning.
14 Correct?

15 A. Uh-huh. Sorry, yes.

16 Q. Oh, there we go, yeah.

17 And the proposed construction maintains the
18 phrase "of VOD content" at the end. Correct?

19 A. So you're saying in my opinion, a POSITA would
20 understand that "providing either a detail view or
21 digest view of VOD content" as it appears in the claims
22 means providing either one or two about a set of VOD
23 content that are associated with a series with that
24 information only about a single episode. I guess I
25 didn't quite understand when you said a VOD content at

1 the end and then how that relates to what -- your
2 question, so maybe --

3 Q. Sure. Let me rephrase.

4 A. Okay.

5 Q. You don't provide an opinion about how "of VOD
6 content" should be interpreted. Correct?

7 A. I don't think there's anything explicit that
8 says what that VOD content, other than there's some
9 implicit description of it maybe being a series or not,
10 or that it's information that is associated with a
11 series.

12 Q. So you're not trying to clarify the meaning of
13 "of VOD content." Is that a fair statement?

14 A. In so much as it's VOD content, and I don't
15 think I'm trying to say oh, it's only -- something
16 special about it. But I think there's a description in
17 what I'm saying that VOD content can have various
18 properties and that there's something about the
19 information about those properties that I'm clarifying.

20 Q. VOD content. What does VOD stand for?

21 A. Video on demand.

22 Q. The term "detail view" does not show up in
23 your proposed construction at paragraph 66. Correct?

24 A. It's not explicit, but it's, I think, implied.

25 Q. Would it be fair to say that paragraph 66

1 includes a proposed construction of the term "detail
2 view" after the number 1 in the bracket?

3 A. I think it -- it's a description of what that
4 claim means -- sorry, what that statement means in the
5 claim in that statement. I don't know that it covers
6 all of what a detail view would be, it's just within
7 that statement.

8 Q. Let me rephrase the question.

9 So you see the brackets 1 and 2 in your
10 proposed construction in paragraph 66?

11 A. Yeah.

12 Q. So bracket number 1, point number 1 that
13 you're making, that relates to a detail view. Is that a
14 fair statement?

15 A. Yeah.

16 Q. And then bracket 2 and, you know, the opinions
17 that you provide after bracket 2, that generally relates
18 to a digest view. Is that a fair statement?

19 A. I think that's a fair statement.

20 Q. The construction in paragraph -- strike that.

21 The proposed construction in paragraph 66
22 includes limitations that were not found in the original
23 claim language. Is that a fair statement?

24 ATTORNEY YANG: Object to form.

25 A. So explicitly, it's a construction, so I think

1 the answer is -- I think that's yes.

2 BY ATTORNEY HWANG:

3 Q. As an example, your proposed construction
4 includes limitation without information that is
5 associated with the series.

6 Do you see that?

7 A. Yep.

8 Q. That limitation is not included in the
9 original claim language. Correct?

10 ATTORNEY YANG: Object to form.

11 A. I don't think so. Not explicitly.

12 BY ATTORNEY HWANG:

13 Q. And on what basis did you add that limitation
14 to your proposed construction?

15 A. I think I was just trying to explain what it
16 meant in reading different portions of the patent. And,
17 you know, I think I'm being a little bit loose in saying
18 single episode as opposed to show or movie, but that's
19 kind of how I would -- I would decide that, that it was
20 trying to delineate between something that's a show,
21 movie, or a single episode and something where there are
22 multiple episodes.

23 Q. Did you add the limitation of "without
24 information that is associated with the series" based on
25 what's in the specification?

1 ATTORNEY YANG: Object to form.

2 A. Yeah. I mean, I think I looked at the
3 specification and read how it talks about these various
4 things and what's included in the detail view.

5 BY ATTORNEY HWANG:

6 Q. And you added that language from the
7 specification into your proposed construction of the
8 claim language. Correct?

9 ATTORNEY YANG: Object to form.

10 A. Yeah, I would just say that I tried to clarify
11 what it meant as best I could.

12 BY ATTORNEY HWANG:

13 Q. And you tried to clarify based on what was
14 written in the specification.

15 Is that correct?

16 A. I think that's fair.

17 Q. Did you attempt to clarify based on what was
18 written in the claim from any other source?

19 A. I don't think so.

20 Q. So it was based purely on what's in the
21 specification?

22 A. I think so.

23 Q. And you see the language "without information
24 only about a single episode"?

25 Do you see that?

1 A. I think it says "about a single episode
2 without information that is associated with a series."
3 I could alternatively add "a movie or show" there also.

4 Q. Okay, so let me rephrase my question, because
5 maybe I misspoke. I don't even remember.

6 Your proposed construction in paragraph 66
7 includes the language "about a single episode without
8 information that is associated with a series."

9 Do you see that?

10 A. I do.

11 Q. Okay. That limitation was not included in the
12 original claim language. Correct?

13 A. I think that's fair.

14 Q. And what was the basis for adding that
15 limitation to your proposed construction?

16 A. Just trying to delineate between the fact that
17 the other one has a series associated with it and what
18 information that might be. And again, like I said, the
19 point I'm trying to clarify, when there's a single
20 episode, there isn't -- of a series but there isn't more
21 episodes, that might be what you would show, a detail
22 view. And it explicitly says that in the patent, I
23 believe.

24 Q. Did you add the phrase "about a single episode
25 without information that is associated with a series"

1 from the specification?

2 ATTORNEY YANG: Object to form.

3 A. I think that's fair.

4 BY ATTORNEY HWANG:

5 Q. Did you add that limitation from any other
6 source aside from the specification?

7 A. No.

8 ATTORNEY YANG: Object to form.

9 BY ATTORNEY HWANG:

10 Q. I think my -- I have a typo somewhere. Give
11 me one second. Do you see page 16 of your declaration
12 on this screen?

13 A. I do.

14 Q. Would it be fair to say that you use Figure 17
15 to support your proposed construction of "providing
16 either a detail view or digest view of VOD content"?

17 A. Part of it.

18 Q. What did you mean by a part of it?

19 A. Not to dispute that there are other parts of
20 the patent that relate to detail view and --

21 Q. I see.

22 A. Yeah.

23 Q. But you used Figure 17, amongst other things,
24 to inform your view of what "providing either a detail
25 view or a digest view of VOD content" would mean to a

1 person of ordinary skill in the art. Is that a fair
2 statement?

3 A. Yeah. And you can kind of see that they're
4 being delineated as two separate things.

5 Q. Okay. In paragraph 68 of your declaration,
6 you rely on the part of the specification discussing
7 digest view 1724. Is that fair statement?

8 A. Yep.

9 Q. And that digest view is shown in Figure 17.
10 Correct?

11 A. Yep. Or yes, if that's more appropriate.

12 Q. Yeah, yep. That's a good question. "Yep" is
13 kind of borderline, but we'll -- let's stick with yes
14 and no.

15 A. Okay.

16 Q. But it's better than uh-huh and huh-uh, I
17 think, so --

18 A. Okay.

19 Q. So anyway, I'm getting sidetracked here. So
20 yeah, if you could answer yes and no --

21 A. Yes.

22 Q. -- then it would be better.

23 A. It'll sound better.

24 Q. Would you agree that Figure 17 falls within
25 the scope of Claim 1?

1 ATTORNEY YANG: Object to scope.

2 A. Claim 1? Just hold on, sorry. I think that's
3 fair.

4 BY ATTORNEY HWANG:

5 Q. What do you currently see on your screen?

6 A. I see a patent.

7 Q. Okay. I want to represent to you that it's
8 the '384 patent. Is that fair statement?

9 A. Yes, sir.

10 Q. Okay. Do you see columns -- strike that.
11 Do you see columns 43 and 44 from the '384
12 patent on your screen?

13 A. Yeah, I do. And I'm just going to, for the
14 sake of speeding things up on my part and not making you
15 zoom in too much, I'm going to bring --

16 Q. Perfectly fine. Yeah, if you have your own
17 copy of the patent, if you can go to columns 43 and 44.

18 A. Yeah, I'm there, uh-huh.

19 Q. Yeah, that might be easier.

20 Do you see line 13 of column 44?

21 A. Yes.

22 Q. Just to make sure we're looking at the same
23 one, can you read the sentence that starts on line 13 of
24 column 44 for the record.

25 A. Yeah. The user may then select some type of

1 content from the collection view 1808 to be provided in
2 either a digest view 1724 or detail view 1728 in tier
3 1716, 1812. That's the sentence.

4 Q. The sentence you just read refers to digest
5 view 1724 or detail view 1728. Correct?

6 A. Correct.

7 Q. Would you agree that the sentence would inform
8 a person of ordinary skill in the art about how the
9 phrase "either digest view or detail view" should be
10 interpreted in the context of the '384 patent's claims?

11 A. It's part of it, sure.

12 Q. And Figure 17 shows digest view 1724 and
13 detail view 1728 that was referred to in column 44 that
14 you just read out loud for the record. Is that a fair
15 statement?

16 A. So yeah, there's a picture in Figure 17 that
17 shows a digest view and a detail view marked as 1724 and
18 1728.

19 Q. Now, are you looking at Figure 17?

20 A. I am.

21 Q. I'll put it on the screen, but you have your
22 own copy, I know.

23 A. Yeah. I just find it easier with two separate
24 pages.

25 Q. Can you look at detail view 1728.

1 A. Yep.

2 Q. Detail view 1728 would include information
3 about a selected item of VOD content. Is that fair
4 statement?

5 A. Yeah.

6 Q. For example, it would include images and text
7 about a selected movie. Correct?

8 A. I think that's fair.

9 Q. Digest view 1724 in Figure 17 shows a box on
10 the left which would include an image. Correct?

11 A. You're saying on the digest view or the detail
12 view?

13 Q. On digest view 1724, do you see that?

14 A. Oh, yeah. I think there's a -- a subsequent
15 picture showing that, but yeah, the -- I believe that
16 was an image on the left.

17 Q. And then digest view 1724 includes rows of --
18 rows of boxes. Do you see that?

19 A. I do.

20 Q. And the boxes would include information about
21 episodes in the series. Correct?

22 A. Yes.

23 ATTORNEY YANG: Object to form.

24 BY ATTORNEY HWANG:

25 Q. Let's go to Figure 35.

1 Would you agree that Figure 35 is consistent
2 with what was shown in Figure 17 for the digest view?

3 A. I do.

4 Q. And Figure 35 is a little bit easier to see.
5 Would you agree that on the left there's an image of --
6 representative of the Game of Thrones TV series?

7 A. Yes.

8 Q. And below that is information about the
9 television series. Correct?

10 A. Yes.

11 Q. On the right, there's episodes of the Game of
12 Thrones television series.

13 Is that accurate?

14 A. I agree with that.

15 Q. And then within the rows, there's information
16 about individual episodes of the Game of Thrones series.

17 Is that fair?

18 A. Yes, sir.

19 Q. That information would include, for example,
20 the title of a particular episode. Correct?

21 A. I think that's fair.

22 Q. Also a short written description of a
23 particular episode of Game of Thrones. Correct?

24 A. I believe that's correct the way that -- it's
25 really hard to read it, but that's -- that is what I

1 believe it says.

2 Q. Also, the run time of each episode is included
3 in Figure 35 in those rows. Correct?

4 A. If -- if it's the number like 1905 in episode
5 1, which is barely legible, I think you're right.

6 Q. And would you agree that in Figure 35, episode
7 32 -- strike that.

8 Would you agree that in Figure 35, episode 2
9 was selected by the user based on the kind of
10 highlighted box around episode 2?

11 A. It would appear to be.

12 Q. Do you have any reason to dispute the fact
13 that the user selected episode 2 in Figure 35?

14 A. I don't.

15 Q. And the second row shown on Figure 35 is for
16 episode 2. Correct?

17 A. Sure.

18 Q. And this would be consistent with a digest
19 view in the '384 patent. Correct?

20 A. So as I understand it, and as this is
21 described as such, I think that's fair.

22 Q. And that digest view shown on Figure 35 would
23 include information about single episodes. Correct?

24 A. I think that's correct.

25 Q. And the image shown on 35 is consistent with

1 the image shown on Figure 17 for digest view 1724.

2 Correct?

3 A. That's correct.

4 ATTORNEY YANG: Object to form.

5 BY ATTORNEY HWANG:

6 Q. Can you please go to Figure 18. And I'm
7 sharing it on the screen as well. Figure 18 of the '384
8 patent --

9 A. Right.

10 Q. -- I should say.

11 A. Sure.

12 Q. Do you see that figure?

13 A. I do.

14 Q. Would you agree that Claim 1 is consistent
15 with the sequence of steps shown in Figure 18?

16 ATTORNEY YANG: Object to form.

17 THE WITNESS: I'm blanking on what you said,
18 the first part of that sentence. You said what's
19 consistent with Figure 18?

20 ATTORNEY HWANG: Sorry, I'll just reask. That
21 might be easier for both of us.

22 BY ATTORNEY HWANG:

23 Q. Would you agree that the sequence of steps
24 shown in Figure 18 is consistent with what is claimed in
25 Claim 1?

1 A. Level so by that, you mean moving from level 1
2 to level 2 and then either showing digest view or detail
3 view and then showing a player view?

4 Q. Yes.

5 I'm sorry, was there an answer? Just for the
6 record to be clear.

7 A. I said yes --

8 Q. Okay.

9 A. -- in answer to that.

10 THE REPORTER: The reporter did not hear it
11 either.

12 THE WITNESS: I thought I said yes, but if I
13 didn't, I meant to.

14 ATTORNEY HWANG: All right, let me do that
15 over again. I think it's more for what's written in the
16 transcript, so let's just make it clean.

17 THE WITNESS: Okay.

18 BY ATTORNEY HWANG:

19 Q. Would you agree that the sequence of steps
20 shown in Figure 18 is consistent with what is claimed in
21 Claim 1?

22 A. So if by that you mean selecting from a master
23 view to a collection view and then deciding to show the
24 digest view or the detail view and then allowing you to
25 play it in a player view, I agree. And so the answer is

1 yes.

2 Q. And then when going from level 2 to level 3,
3 you would go from a collection view to either a digest
4 view or a detail view. Correct?

5 A. I think that's correct.

6 Q. And the specification does not teach that a
7 digest view must be provided before a detail view.
8 Correct?

9 A. No.

10 Q. The user can go to either a digest view or a
11 detail view in any order from the collection view based
12 on what's taught in the '384 patent. Correct?

13 A. There's nothing stopping you from doing that
14 based on what's taught.

15 Q. Claim 1 does not recite that the user must
16 make a selection that will lead to a digest view before
17 making a selection leading to a detail view. Correct?

18 ATTORNEY YANG: Object to form.

19 A. You're saying that it does not suggest that a
20 digest view must appear before a detail view. Is that
21 correct?

22 BY ATTORNEY HWANG:

23 Q. It does not require a digest view to be
24 presented before a detail view. Correct?

25 ATTORNEY YANG: Object to form.

1 A. I don't think so.

2 BY ATTORNEY HWANG:

3 Q. So put another way, according to Claim 1, a
4 user is free to make any selection he or she wants in
5 the collection view, which will then dictate whether a
6 detail view or digest view is presented after that
7 selection. Correct?

8 A. So they're free to do that. As to whether
9 they meet the claims will depend on the particular
10 situation. Sorry, claim limitation, not just claim.

11 Q. Okay, let's explore that answer, because I
12 think we're on the same page but I want to make sure.

13 A. Yeah.

14 Q. So say that you're on the collection view --

15 A. Uh-huh.

16 Q. -- right? And according to the claim, you can
17 select either the digest view or the detail view.
18 Correct?

19 A. That's correct.

20 Q. Now, according to Claim 1, the user could
21 select and make a selection that would lead you to the
22 detail view first. Correct?

23 A. They could.

24 Q. Or, in the alternative, the user could make a
25 selection that would lead you to a digest view.

1 Correct?

2 A. That's correct. So that limitation would be
3 met. You could do either.

4 Q. And neither the digest view nor the detail
5 view has to be selected first. Correct?

6 A. That's correct.

7 Q. If you have your patent, let's go to Claims 4
8 and 5.

9 A. Okay.

10 Q. I'll show it to you on the screen, but it
11 might be easier for you to look on your own copy.

12 A. Okay.

13 Q. And then can you confirm Claim 4 recites
14 "receiving a fourth selection of an episode in the
15 digest view." Correct?

16 A. Just give me a second, yeah.

17 Q. Yeah.

18 A. Claim 4. Okay, the method as defined in
19 Claim 3 further comprising receiving a fourth selection
20 of an episode in the digest view, okay.

21 Q. So Claim 4 recites "receiving a fourth
22 selection of an episode in the digest view." Correct?

23 A. Yes.

24 Q. Claim 5 recites "receiving a fifth selection
25 of a user interface device to play a movie or single

1 show." Correct?

2 A. Yeah.

3 Q. The limitation for "a user interface device"
4 is first introduced in Claim 5. Correct?

5 A. I think Claim 2 has "a user interface device"
6 in it, doesn't it?

7 Q. I'll -- I'll help you a little bit. Claim 5
8 and Claim 2 are not related, are they?

9 A. No, they're not.

10 Q. Okay, so let me reask.

11 The limitation for "a user interface device"
12 is first introduced in Claim 5. Correct?

13 A. That's correct.

14 Q. And Claim 5 ultimately traces back to Claim 1.
15 Isn't that a fair statement?

16 A. That's fair.

17 Q. Now going to your declaration, paragraph 64,
18 in paragraph 64, you state that the final claim steps
19 require that the system receive a selection to change
20 the VOD content through the user interface device.

21 Is that fair statement?

22 A. Right.

23 Q. Is that a yes?

24 A. Yes.

25 Q. Okay. Are you saying that Claims 4 and 5

1 require the system to go directly from an episode in a
2 series to a movie using the user interface device?

3 A. It would appear that 5 requires a user
4 interface device.

5 Q. Right. So I'm trying to understand what your
6 opinion is in paragraph 64 a little bit better.

7 A. Oh, I see. Okay, just give me a second.

8 Q. Is it your opinion -- and again, I'm seeking
9 clarification here.

10 A. Okay.

11 Q. Is it your opinion that what's claimed in
12 Claims 4 and 5 require the system to go directly from an
13 episode in a series to a movie using the user interface
14 device?

15 A. I see what you're saying. Just give me a
16 second. So I think that in Claim 5, it's requiring a
17 user interface device. In Claim 4, I don't see anything
18 that requires that.

19 Q. Okay. But you're answering a different
20 question than the one I asked. But it might be because
21 there was a break and you were kind of considering
22 things, so let me reask the question and then see if we
23 can get to the bottom of this. So I'm trying to clarify
24 what your opinion was and is in paragraph 64.

25 Do you see paragraph 64?

1 So the first part of the question's very
2 simple. Do you see paragraph 4?

3 A. Yes, so let me just get there. Yes.

4 Q. In paragraph 64, is it your opinion that the
5 system needs to go directly from the episode in a series
6 to a movie using the user interface device? And the
7 word "direct" is what I'm really looking at here. Does
8 there need to be a direct link between the series and
9 the movie?

10 ATTORNEY YANG: Object to form and scope.

11 A. I think so, for at least Claim 5.

12 BY ATTORNEY HWANG:

13 Q. Okay. So that's what your opinion is in
14 paragraph 64?

15 A. I think so.

16 Q. That there needs to be a direct link between
17 the TV episode and the movie?

18 A. Yes.

19 Q. Okay. I just want to clarify because it
20 wasn't clear to me.

21 A. Okay, that's fair.

22 Q. The limitation of "receiving a selection to
23 change the VOD content" is not recited in the claims.
24 Correct?

25 A. So that you're saying in the lim -- which

1 lim -- when -- what you're talking about, which
2 limitation?

3 Q. Claims 4 and 5 more directly.

4 A. Okay. So 5 talks about receiving a fifth
5 selection of a user to play the movie or single show and
6 in response to the fifth selection providing a player to
7 present the movie or single show to the user. And
8 you're saying that there's no explicit reference to
9 changing the content.

10 Q. Correct.

11 A. I think it's implicit, but it's not explicit.

12 Q. So the limitation of "receiving a selection to
13 change the VOD content" is not recited in Claims 4 and
14 5. Correct?

15 A. Not explicitly.

16 Q. And you're using the specification to
17 implicitly interpret Claims 4 and 5 to require a
18 selection to change the VOD content. Is that a fair
19 statement?

20 A. Well, I --

21 ATTORNEY YANG: Object to form.

22 A. Well, I'm -- in the first case, you're
23 selecting an episode, which is necessarily different
24 than a movie or single show.

25 BY ATTORNEY HWANG:

1 Q. Anything else?

2 A. I feel like that is how I got to my implicit.

3 Q. So you did not rely on the specification to
4 reach --

5 A. I did --

6 Q. -- your opinion?

7 A. I did rely on the specification because the
8 specification further, you know, explains how to
9 interpret the claim terms. And certainly, it talks
10 about what a show is, what an episode is, what a -- a
11 digest view is, and what a detail view is.

12 Q. Is it your understanding of the claim language
13 in Claims 4 and 5 that the fifth selection must occur
14 immediately following the claimed fourth selection?

15 A. I think so.

16 Q. Is it your understanding that the user
17 interface device must be located in the digest view?

18 A. I think the definition of a user interface
19 device is a remote control, right? Let me just look
20 that up.

21 Q. Again, I'm trying to understand your opinions,
22 and then we'll dive a little deeper, but --

23 A. Yeah, I mean, I think generally -- can I
24 just -- I'm just going to go and talk about a place in
25 my thing where I talk about this.

1 Q. Let me ask the question this way. I know
2 we're --

3 A. Yeah.

4 Q. -- in a bit of a pause in the action here.
5 Claim 5 introduces the concept of a user interface
6 device. Correct?

7 A. Right. It's correct.

8 Q. Now, if you go to page -- paragraph 118 of
9 your declaration, you say that there's a selection of
10 the user interface device within the digest view.

11 Do you agree with that?

12 A. Where does it say that? Sorry.

13 Q. If you go to paragraph 118 of your
14 declaration.

15 A. Okay, okay. Then selecting from the digest
16 view the user interface device to present a player for a
17 movie or a single show. And what was it that you were
18 saying about that?

19 Q. Yeah, so let me -- let me kind of go back and
20 ask some questions here.

21 So according to Claims 4 and 5, is it your
22 understanding that the user interface device must be
23 located in the digest view?

24 A. Right. And I wanted to double-check what I --
25 what I said, because I have it -- just a second. But

1 now I understand your question. So yes, that's correct.

2 Q. And that is your -- is it your understanding
3 that Claims 4 and 5 require the user to go from the
4 digest view to the detail view using the user interface
5 device in a direct manner?

6 A. For the fifth -- for the fifth press? Is that
7 what you're asking?

8 Q. Let me rephrase the question. Is it your
9 understanding that Claims -- strike that.

10 Is it your understanding of Claims 4 and 5
11 that the user must go from the player for an episode for
12 a series to a player for a movie using the user
13 interface device without any intermediate steps?

14 A. That's correct.

15 Q. And what is the basis of that opinion?

16 A. So I would just say that the -- the fact that
17 it talks about a fifth selection means that it's the
18 next step. Doesn't talk about any intermediary steps.
19 And -- and that numbering suggests to me that there
20 aren't any intermediary steps with regard to these
21 interface inputs and things like that, so that's how I
22 come to that conclusion. And when I look at --

23 Q. Is it --

24 A. Sorry.

25 Q. Is it your understanding that the claims

1 preclude any steps occurring between the fifth selection
2 and the fourth selection?

3 A. I think so.

4 Q. And is that based on the claim language, or
5 something else?

6 A. The claim language.

7 Q. So if you had a fourth selection, the user
8 could not do anything else before making the fifth
9 selection? Is that your opinion?

10 ATTORNEY YANG: Object to form.

11 A. If they selected some user interface, if
12 they -- they -- they would have to be able -- they'd
13 have to from the player screen to go directly to the
14 other player screen using some user interface device.

15 BY ATTORNEY HWANG:

16 Q. So my question here is a little bit different.
17 So you have a fourth selection, okay?

18 Are you with me so far?

19 A. Yeah.

20 Q. Let's say the -- the user makes another
21 selection and then makes what could be considered to be
22 the fifth selection. Is it your opinion that the claim
23 precludes that from occurring?

24 ATTORNEY YANG: Object to form.

25 A. I'm not sure what that selection -- so you're

1 saying they make the selection and it's playing, and
2 then they make a fifth selection that's -- I mean, it --
3 you know, four plus one selection and then a, quote,
4 fifth selection, and you're saying that if something in
5 between occurs, that doesn't count after the playing has
6 happened.

7 BY ATTORNEY HWANG:

8 Q. I'm trying to get your understanding.

9 A. My understanding is I would just simply say
10 after the fourth selection, you've got a player playing.
11 You can't subsequently -- you have to be able to select
12 to play, for example, a movie or show after that to
13 met -- meet -- meet their -- meet the claim.

14 Q. So you --

15 A. Claim language.

16 Q. -- you've used Netflix a lot, right?

17 A. Yeah.

18 Q. So you make a selection to start watching The
19 Office, okay? And that would be the fourth selection,
20 right?

21 A. Right.

22 Q. So the next thing that you do with Netflix
23 would be to push a button to then watch a movie?

24 A. Well, Netflix may or may not meet the claim
25 limitations, but Netflix, I'm not sure it is or isn't

1 possible to do that.

2 Q. And is it your opinion that the claim requires
3 where the fourth selection would start the episode and
4 then the next selection made by the user must then
5 transition to a movie for Claim 5?

6 A. That's what it says.

7 ATTORNEY YANG: Object to form.

8 A. Sorry, that -- that -- that's what I, as a
9 POSITA, think it says.

10 BY ATTORNEY HWANG:

11 Q. Okay. And that would apply equally to
12 infringement too, right?

13 A. I'm not here to opine on infringement.

14 Q. Okay. But your opinion as an expert on behalf
15 of MMT is that for the fourth selection, a selection
16 that would satisfy the fourth selection would be
17 selecting a button to play an episode of, for example,
18 The Office. We're -- we're in accord there. Correct?

19 A. Yeah, I agree with that.

20 Q. And then the fifth selection must occur
21 immediately after the fourth selection, correct --

22 A. Yeah.

23 Q. -- according to Claim 5?

24 A. Yeah, that's how I would interpret this claim,
25 yes.

1 Q. And then that fifth selection would
2 immediately start playing a movie. Correct?

3 A. Yes, sir. That's the -- that's -- that's
4 what's required by the claim.

5 Q. And how would you even decide what movie to
6 play with that fifth selection if there's no
7 intermediate selections that are possible from the user?

8 A. Well, you've got --

9 ATTORNEY YANG: Object to form and scope.

10 A. Yeah, I didn't -- I had -- I didn't consider
11 that. I wasn't asked to consider that example. I --
12 I'm not -- I was asked to look at the examples and
13 explain why they were or weren't good examples. And
14 you're asking me to take some hypothetical situation
15 that I haven't spent a lot of time thinking about, and I
16 don't know that I can give you off-the-cuff answers to
17 these questions, or I feel comfortable doing that.

18 BY ATTORNEY HWANG:

19 Q. Okay, fair enough. But that's your
20 interpretation of Claims 4 and 5. Correct?

21 A. That is correct.

22 Q. And that -- is that supported by the
23 specification?

24 A. I mean, that's what the claim says and -- and
25 in much as it's part of the specification, it is

1 supported by the specification that, as it's written and
2 as the -- as -- as it's written, that's my opinion, yes.

3 Q. So it's your opinion that the specification
4 supports a read of the claim where the user would make a
5 fourth selection to start playing an episode of a TV
6 series, and then the immediate next selection, being the
7 fifth selection, would then play a movie? That's
8 supported by the specification?

9 A. No, it's what the claim --

10 ATTORNEY YANG: Object to form.

11 A. Yeah, it's what the claim says, so I'm telling
12 you what the claim says. That's literally what it says.

13 BY ATTORNEY HWANG:

14 Q. Right. So in your opinion, that's what the
15 claim says. Correct?

16 A. Yeah.

17 Q. Does the specification support that claim
18 language?

19 A. I, you know, I -- I -- I think it does, but
20 you -- I could see how someone might say it might not.
21 But that's my position as a POSITA, that I read the
22 claim, I read the specification, and I believe it says
23 what I -- I said. If -- if they wanted it to mean
24 something else, they could have written it a
25 different -- different way.

1 Q. Can you point me to where in the specification
2 it supports your read of Claims 4 and 5 where the fourth
3 selection would be to start an episode and the next
4 immediate selection would then start playing a movie?

5 A. No, it's the English language, and this claim
6 says what it says.

7 Q. No, no. I'm not talking about the claim
8 language. Now I'm talking about the specification.
9 What part of the specification supports that view?

10 A. It doesn't provide a permissive example of it,
11 but it doesn't provide a reason not to support that
12 example. So I'm not saying it's not -- that's not the
13 case. It's supporting it.

14 Q. Okay, fair enough.

15 Anything else to add to that answer?

16 A. Nothing more.

17 Q. What is your understanding of the term "user
18 interface device" as it's used in the '384 patent?

19 A. So it's -- the user may select a thumbnail
20 within one of the user interface's devices shown in
21 Figures 21 through 25. There's an example. The
22 selection may be used -- may be made using a directional
23 pad or change of focus onto one of the thumbnails and
24 using the okay button. That's one example of how a user
25 interface device is explained.

1 I think I have other places that I say this.
2 Figures 21 through 25 show the VOD content navigated by
3 the end user inter device in -- sorry, device includes
4 categories such as movies, TV series, and varieties. So
5 I would just say paragraph 61. Finally, steps 9 and 10
6 must be formed last because the '384 patent
7 specification teaches that the user uses the user
8 interface device to change between or navigate different
9 VOD content.

10 So it at least means that it can be used to
11 change between or navigate different VOD content, and
12 then I give some examples below in paragraphs 61 and 62.

13 Q. Okay, let's do this just to -- let's go to
14 column 46 of the '384 patent.

15 A. Yeah, sure.

16 Q. Then let me know when you're there.

17 A. Okay, just a second, okay?

18 Q. Yeah.

19 A. Okay.

20 Q. Can you please read out loud the first
21 sentence starting on line 15 of column 46 for the
22 record.

23 A. Okay. The user may then use the directional
24 pad 760 or some other remote control button on a
25 control -- remote control 700 to select one of the four

1 user interface devices, 2104 through 2116 on the
2 navigation bar 2120. For example, the user may put the
3 focus (e.g., the focus is currently on the showcase
4 selection 2104 in Figure 21) on one of the text displays
5 in navigation bar 2120 in user interface 2100 and then
6 select an okay button to select the materials for that
7 user interface device 2104 through 2116.

8 Q. Okay, you can stop there. I think you rely on
9 this paragraph to support your opinions in your
10 declaration. Is that a fair statement?

11 A. I think that's right, but let me just
12 double-check. I'm not sure I did. Can you show me
13 where?

14 Q. You know, I -- I'll just rephrase the
15 question.

16 A. Okay.

17 Q. I think you did, but I can get there.
18 Would you agree, is it a fair statement, that
19 Figure 21 shows examples of four user interface devices?

20 A. Okay, I -- let me -- by the way, when we get
21 done with this, do you think we can take a break?

22 Q. Sure.

23 A. Okay. I'm just -- 4, 3, okay. Sure, okay.

24 Q. The record's a little unclear. What are you
25 saying "sure" to?

1 A. Oh, I'm sorry. I'm looking at Figure 21, and
2 I think you said it's pointing to different -- 2104
3 through 2116 as user interface devices.

4 Q. It shows four examples of user interface
5 devices. Correct?

6 A. Yes.

7 ATTORNEY HWANG: Okay, you know what? We'll
8 just take a break here. It's not a big deal. Five
9 minutes, 10 minutes. Doesn't matter to me.

10 THE WITNESS: 10 minutes would be good.

11 ATTORNEY HWANG: Top of the hour?

12 THE WITNESS: Yeah.

13 (Recess taken.)

14 BY ATTORNEY HWANG:

15 Q. Okay. During the break, did you communicate
16 with anyone?

17 A. Nope.

18 Q. Okay. And have you been communicating with
19 anyone other than myself during this deposition?

20 A. No, sir.

21 Q. Great.

22 Let me go back. And because we took that
23 break, let me kind of retread a little bit of ground.
24 So we were looking at column 46 of the '384 patent.
25 Correct?

1 A. Yeah, 46. And we were looking at user
2 interface devices, right?

3 Q. Yeah. And you read aloud into the record
4 column 46, lines 15 through about line 24 or -- yeah, 23
5 or 24. Is that a fair statement?

6 A. Yeah, I think it was 23, but yeah.

7 Q. And in that paragraph it talks about four user
8 interfaces, 2104 through 2116.

9 Is that a fair statement?

10 A. That is.

11 Q. And it's referring to Figure 21.

12 Is that a fair statement?

13 A. That is.

14 Q. Okay. So let's go to Figure 21 of the '384
15 patent. I will share it, but I know you have your own
16 copy, so you can look at either.

17 A. Yep.

18 Q. Okay. Do you see Figure 21?

19 A. I do.

20 Q. Okay. The paragraph that we were just looking
21 at talked about user interface devices 2104 through
22 2116. Correct?

23 A. Correct.

24 Q. And it said there were four of them. Correct?

25 A. Yes, sir.

1 Q. Now, on Figure 21, do you see the number 2104?
2 A. I do.
3 Q. That points to the button for showcase.
4 Correct?
5 A. Uh-huh, yes.
6 Q. 2108 points to a button for movies. Correct?
7 A. Correct.
8 Q. 2112 points to a button for TV series.
9 Correct?
10 A. Correct.
11 Q. And 2116 points to a button for variety.
12 Correct?
13 A. Correct.
14 Q. Those would be the four user interface devices
15 described in column 46, line -- starting at line 15.
16 Correct?
17 A. Yes.
18 Q. Okay. And those user interface devices are
19 shown as being selectable buttons.
20 Is that a fair statement?
21 A. I think that's correct.
22 Q. Do you see user interface device 2108?
23 A. I do.
24 Q. Selecting user interface 2108 would cause
25 movies to be presented to the user.

1 Is that a fair statement?

2 A. I think that's fair.

3 Q. And would a person of ordinary skill in the
4 art understand that selecting user interface device 2108
5 for movies would not also show television shows?

6 A. I think in the main part of the screen, I
7 think that's fair, that as this user interface is
8 constructed, I think that's fair. There are other user
9 interfaces where that might not be the case, where they
10 may click mainly movies and then at the bottom, do
11 something different.

12 Q. Within the '384 patent, a user interface
13 device can be a selectable button. Fair statement?

14 A. I think so.

15 Q. You don't have an opinion about the term "user
16 interface device" having some other special meaning.
17 Correct?

18 A. No, unless there's some -- at this moment, I
19 don't believe so.

20 Q. So when Claim 5 uses the term "user interface
21 device," it could be referring to a selectable button.
22 Correct?

23 A. I think that's fair.

24 Q. You provided a CV in this IPR. Correct?

25 A. I did.

1 Q. Anything -- to the best of your knowledge, is
2 it accurate?

3 A. To the best of my knowledge, it is accurate.

4 Q. Anything missing from this CV that you want to
5 disclose?

6 A. I recently started a company that I'm going to
7 add to my CV related to sleep interface devices, but
8 that's about it.

9 Q. And currently, what percentage of your time is
10 dedicated to providing legal expert consulting?

11 A. It varies between 30 and 50 percent this time
12 of the year, but I would say it's about 30 to 40 percent
13 of my income.

14 Q. So what do you spend the majority of your time
15 on?

16 A. Startups and investing. Those startups that I
17 run, and investing in other startups.

18 Q. Did you go to school with the -- with
19 Dr. Houh?

20 A. I did.

21 Q. Were you in the same classes?

22 A. No. He's two years older than me, but I would
23 see him -- laboratory, two floors above me, so I had
24 occasion to meet him and --

25 Q. Really? Back in school?

1 A. Yeah. And I knew his professor also, so
2 sometimes I'd go visit him.

3 Q. I don't know if it's relevant to this IPR, but
4 it's interesting. Small world. Interesting.

5 A. Yeah, I know, I know him forever.

6 Q. Did you keep in contact with him after school
7 or --

8 A. Oh, yeah. I'd see him. I may have lunch with
9 him sometime, but we'll never -- would not discuss any
10 of this stuff.

11 Q. Okay. I guess that was my next question.
12 Have you talked to him about this matter at all?

13 A. No. We don't talk about these matters ever.

14 Q. Okay. When was the last time you spoke to
15 him?

16 A. I spoke to him a few weeks back about --

17 THE REPORTER: Excuse me. I want the witness
18 to come close to your mic so I can hear you better. I
19 couldn't hear you.

20 THE WITNESS: About having lunch.

21 THE REPORTER: Thank you.

22 BY ATTORNEY HWANG:

23 Q. Okay. But no conversations about the patents
24 or, you know, MMT or Vizio or anything like that, right?

25 A. Not at all.

1 Q. Okay. Do you know the inventors of any of the
2 patents?

3 A. I don't personally know them, but I may meet
4 one in Texas, this guy, Sanjiv Sirpal, in the next few
5 weeks, but I've never met him in person --

6 Q. Is --

7 A. -- or --

8 Q. Would that be that in relation to litigation?

9 A. Yes.

10 Q. Okay.

11 A. The LG litigation.

12 Q. But you haven't -- you didn't know them before
13 the litigation matters involving the '384 patent.
14 Correct?

15 A. I did not.

16 Q. Were you aware of the prior art references
17 relied upon in this proceeding before you got involved
18 in this proceeding?

19 A. I don't know that I knew those particular
20 videos, but I certainly knew -- I certainly had a Vizio
21 TV and used a bunch of these TVs and run Netflix on
22 them, so in that way, kind of.

23 ATTORNEY HWANG: Okay. You know what? Let's
24 take a five-minute break.

25 THE WITNESS: Uh-huh.

1 ATTORNEY HWANG: I'll go over my notes. At
2 most, I'll probably have another little section of
3 questions; but otherwise, we're getting close to the end
4 here.

5 (Recess taken.)

6 BY ATTORNEY HWANG:

7 Q. Let me share your declaration again.

8 A. Okay.

9 Q. In paragraph 109 of your declaration, you show
10 an image from Netflix at the top.

11 Do you see that on your screen?

12 A. I do.

13 Q. Now, you agree that this qualifies as a digest
14 view. Correct?

15 A. Just a second. We're looking at page 45?

16 Q. Page 45 of your declaration. It's on the
17 screen as well, if you want to look at that.

18 A. This is consistent with the definition of the
19 institution decision, sure.

20 Q. Okay. So I'm not sure if you answered my --
21 I'll just ask the question again.

22 On page 45 of your declaration in
23 paragraph 109 you see the image on the top there.
24 Correct?

25 I didn't hear a response. Are you muted,

1 or --

2 THE REPORTER: The reporter didn't hear it
3 either.

4 THE WITNESS: Oh. Can you hear me now?
5 Hello?

6 ATTORNEY HWANG: Yeah, we can hear you now.

7 THE WITNESS: Okay. I think something got
8 covered up.

9 A. Yeah, so I think it's a -- I would consider
10 that a digest view, and I explained how I came to that.

11 BY ATTORNEY HWANG:

12 Q. I'm moving on to page 46 of your declaration.
13 At the top there do you see another image?

14 A. Yes.

15 Q. This also qualifies as a digest view.
16 Correct?

17 A. Yes. Again, I think this is a digest view,
18 and I explain how I got there.

19 Q. I'm on page 48 --

20 A. Yes, sir.

21 Q. -- of your declaration. At the top of page
22 48, which would be within paragraph 112 of your
23 declaration, you see the image from the Apple TV device?

24 A. Yes.

25 Q. That would also qualify as a digest view.

1 Correct?

2 A. I -- I agree as well, and that's consist --
3 I -- that's -- I explain how I got there as well.

4 Q. On top of page 49, you see the image that you
5 included as a part of paragraph 113 in your report?

6 A. I do.

7 Q. It's for House. Do you see that?

8 A. Yes.

9 Q. This also qualifies as a digest view.

10 Correct?

11 A. Yes, I agree. I think it's a digest view, and
12 I explain how I got there.

13 Q. I'm on page 41 of your declaration. At the
14 top, it's Figure 8. Do you see that?

15 A. Yeah.

16 Q. Do you agree that that shows a detail view?

17 A. Just a second. I think that's fair. Do you
18 hear me?

19 Q. Yeah, it was a little muffled. Let me
20 rephrase the question.

21 A. Okay. I -- I just said -- oh, go ahead.
22 Sorry.

23 Q. Yeah. On the top of page 41 in your
24 declaration it shows Figure 8 of Hunt. Correct?

25 A. Right.

1 Q. And Figure 8 of Hunt shows a detail view.
2 Correct?

3 A. Yes, I believe that's a detail view.

4 Q. And Figure 11 of Hunt would be a digest view.
5 Correct?

6 A. It can be considered a digest view, yes.

7 Q. Okay, going to -- I see page 7 of 15 of
8 Exhibit 1023. Do you see that on your screen?

9 A. Okay.

10 Q. It shows Cobra Kai.

11 A. Okay.

12 Q. Do you see that?

13 A. Yeah.

14 Q. Now, this includes information about episodes.
15 Correct?

16 ATTORNEY YANG: Object to scope.

17 A. It does show episodes.

18 BY ATTORNEY HWANG:

19 Q. Would this be considered a digest view?

20 ATTORNEY YANG: Object to scope.

21 A. I haven't been involved with this
22 infringement. Is this an infringement contention?

23 BY ATTORNEY HWANG:

24 Q. Yes.

25 A. So I haven't been involved with it so I

1 haven't considered it for the purpose of this IPR and so
2 I would be -- I could take a look at it, but I'd be a
3 little uncomfortable giving you an off-the-cuff answer
4 to that question.

5 Q. That's fine. We have all day. Take a look at
6 the image on the screen.

7 A. Okay.

8 Q. Would it qualify as a digest view based on
9 your understanding of the claims?

10 ATTORNEY YANG: Object to scope.

11 A. So this is Netflix?

12 BY ATTORNEY HWANG:

13 Q. Yes.

14 A. Okay. Can we look at what one -- was that the
15 whole of 1F, G, H?

16 Q. Yeah, let's --

17 A. Is it --

18 Q. -- just focus on the image on page 7 here for
19 Exhibit 1023, which is a part of the IPR. Looking at
20 the image for Cobra Kai, would this qualify as a digest
21 view?

22 ATTORNEY YANG: Object to scope.

23 A. So this is -- looks like it says it's
24 season 1. Season 1 is selected. It is meant -- in --
25 what's the -- this is a Vizio TV playing Netflix, right?

1 BY ATTORNEY HWANG:

2 Q. I believe so.

3 A. Okay. I think it's fair to say that's a
4 digest view.

5 Q. Just curious. What screen are you guys
6 seeing?

7 A. I'm seeing 1G of Cobra Kai.

8 Q. Okay. So you're still seeing the Cobra Kai
9 screen?

10 A. Yeah.

11 Q. Do you see your declaration at all?

12 A. No.

13 ATTORNEY HWANG: Okay. I have two screens so
14 I just want to make sure you're looking at the right
15 screen. Actually, I have some weird -- can we take a
16 five-minute break?

17 THE WITNESS: Sure.

18 (Recess taken.)

19 ATTORNEY HWANG: Okay, going back on the
20 record, I apologize for that. There was a disturbance
21 on my end.

22 BY ATTORNEY HWANG:

23 Q. Do you see your declaration on the screen?

24 A. I do.

25 Q. Can we go back to paragraph 70? And if you

1 have a copy of your own, that's fine too.

2 A. Yeah.

3 Q. And then looking at paragraph 70, I think we
4 already established this, but just asking again. Your
5 proposed construction does not change providing either.
6 Correct?

7 A. No.

8 Q. Okay. It really deals with a detail view and
9 a digest view. Correct?

10 A. Right.

11 Q. And then bracket 1 relates to a detail view.
12 Correct?

13 A. Right.

14 Q. And bracket 2 relates to a digest view.
15 Correct?

16 A. That's correct.

17 Q. And then for a detail view, a detail view
18 would be a view of information about a single episode
19 that does not -- without information that is associated
20 with the series. Correct?

21 A. That's correct.

22 Q. Now I'm looking at page 45 of your
23 declaration.

24 A. Yep.

25 Q. Do you see the image at the top?

1 A. Yeah.

2 Q. Now, I already asked you if this qualifies as
3 a digest view and you said yes, right?

4 A. Right.

5 Q. Now, this includes information about a series.
6 Correct?

7 A. It does.

8 Q. So this would not qualify as a detail view as
9 you proposed in your claim construction. Correct?

10 ATTORNEY YANG: Object to form.

11 A. I think in what I wrote in the claim
12 construction, I explained how -- what I -- what I did in
13 that claim construction, but then I also discuss what --
14 how I came to the decision in writing about this that I
15 was applying what the definition of the institution was
16 when I made the statement.

17 BY ATTORNEY HWANG:

18 Q. Okay, I'll move to strike as nonresponsive.
19 I'm just looking at your opinions on page 45.
20 And at the top, you include a screenshot of a digest
21 view. Correct?

22 A. Right.

23 Q. Now, according to your proposed
24 construction -- and I'm not talking about anything else,
25 but according to your proposed construction, the view on

1 the top of page 45 would not qualify as a detail view.
2 Correct?

3 A. So according to --

4 ATTORNEY YANG: Objection.

5 THE WITNESS: Oh --

6 THE REPORTER: Was there an objection?

7 THE WITNESS: -- I'm sorry.

8 ATTORNEY YANG: Objection, form.

9 THE REPORTER: Thank you.

10 A. So all I'm going to say is -- so what I would
11 say is the -- under the proposed construction as
12 written, it would not qualify. But it would qualify
13 under what I wrote in the explanation of that
14 declaration under the institution's decision.

15 BY ATTORNEY HWANG:

16 Q. Same thing with the image on the top of page
17 46 of your declaration. That shows a digest view.
18 Correct?

19 A. That's correct.

20 Q. According to your proposed construction, the
21 image on the top of page 46 of your declaration would
22 not qualify as a detail view. Correct?

23 ATTORNEY YANG: Object to form.

24 A. So it's the same answer as before. It would
25 not qualify under the proposed construction I provided

1 in the Claim Construction section. But again, I explain
2 that it would qualify under the institution's decision
3 construction of the term for proposed nonexpress
4 construction of -- of detail view.

5 BY ATTORNEY HWANG:

6 Q. And it's your opinion that the board should
7 accept your proposed construction of the "providing"
8 phrase. Correct?

9 ATTORNEY YANG: Object to form.

10 A. I think I'd like them to.

11 BY ATTORNEY HWANG:

12 Q. It's your opinion that the claim construction
13 in paragraph 70 of your declaration accurately reflects
14 how a POSITA -- how a person of ordinary skill in the
15 art would differentiate a detail view from a digest
16 view. Correct?

17 ATTORNEY YANG: Object to form.

18 A. I would just say that it was a little sloppy
19 and that I probably should have mentioned a show or
20 movie. But other than that, I think that's fine.

21 BY ATTORNEY HWANG:

22 Q. Going back to Exhibit 1023, page 7 --

23 A. Uh-huh.

24 Q. -- I'm looking at the image of Cobra Kai, and
25 it's on your screen.

1 Do you see that?

2 A. I do.

3 Q. Is it your opinion that this image would not
4 qualify as a detail view?

5 A. Yeah, I --

6 ATTORNEY YANG: Object to form and scope.

7 A. Yeah, so under -- let me look at that. I
8 would just say that under the proposed construction, it
9 would not qualify as a detail view. Under the
10 institution's decision, it would qualify.

11 BY ATTORNEY HWANG:

12 Q. And when you say the institution decision
13 claim construction, is it your understanding that there
14 was a formal construction of detail view in the
15 institution decision?

16 ATTORNEY YANG: Object to form and scope.

17 A. Yeah, I mean, I read what I said about that,
18 and I said basically that even though we could go back
19 and look what it says, but it -- I believe it says that
20 it's not an express construction, but it had a
21 preliminary idea of what it meant. So I assume they're
22 going to have to consider that when they're making their
23 decision.

24 BY ATTORNEY HWANG:

25 Q. Give me one second. Is it your

1 understanding -- strike that.

2 Would you agree that the institution decision
3 included no express constructions of any claim terms?

4 ATTORNEY YANG: Object to scope.

5 A. Can I -- I'm -- I need to look at the
6 institution decision.

7 BY ATTORNEY HWANG:

8 Q. Let me do this. Do you see -- what document
9 do you see on the -- on the screen?

10 A. I was seeing the institution decision, and I
11 think you had it in the right place. You said there's
12 no express -- right. It says: I agree that there's
13 no -- that the institute determined that no express
14 construction of any claim term is necessary for the
15 purpose of institution.

16 Q. And so before when you said you were relying
17 on the board's construction of detail view, there is no
18 such construction of detail view. Correct?

19 ATTORNEY YANG: Object to form.

20 A. Just a second here. I don't think there's any
21 express construction.

22 BY ATTORNEY HWANG:

23 Q. I'm looking at page 22 of the institution
24 decision.

25 A. Uh-huh.

1 Q. It's Figure 2 from Hunleth, I believe.

2 A. Okay.

3 Q. Do you see where it says "Drama, Tom Hanks,
4 Apollo 13," just so the record's clear?

5 A. I do.

6 Q. This shows a detail view. Correct?

7 A. I think that's fair.

8 ATTORNEY HWANG: Okay, you know what? I think
9 I'm at the end. Give me another five minutes, but I
10 think I have zero questions. I'm pretty sure I have
11 zero, but let me look at my outline again and then we'll
12 go from there.

13 (Recess taken.)

14 ATTORNEY HWANG: Thank you for your time. I
15 have no further questions, so I will pass the witness.

16 ATTORNEY YANG: Okay. Can we go off the
17 record for 15 minutes? I do have some questions but I
18 want to write them down first.

19 (Recess taken.)

20 EXAMINATION

21 BY ATTORNEY YANG:

22 Q. Dr. Surati, can I direct you to paragraph 70
23 of your declaration.

24 A. Sure.

25 Q. And let me know when you get there.

1 A. Oh, great. Paragraph 70, not page 70.

2 Q. Yeah, 70, paragraph seven-zero.

3 A. I got things mixed up here. This will take a
4 second. Okay, paragraph 67, 70, yeah.

5 Q. Okay. Do you recall when you were asked about
6 the clarification "without information only about a
7 single episode in the construction of providing either a
8 detail view or a digest view of the VOD content"?

9 A. Right.

10 Q. And do you recall being asked whether this
11 clarification was based purely on the specification?

12 A. Yes.

13 Q. And is this clarification also based on and
14 consistent with the either/or claim language discussed
15 in paragraph 67?

16 ATTORNEY HWANG: Objection, leading. You
17 can't ask leading questions. Anyway, objection, form,
18 leading.

19 A. Okay, so when I talked about the
20 specification, I thought that meant -- or at least I
21 would interpret that to mean to include the claim
22 language that was in the claim. But just for further
23 clarification, in paragraph 67, I explain that I'm --
24 I'm basing it on the use of the either/or notion that's
25 in the claim language and that they need to be separate

1 and distinct. And that's part of my discussion.

2 I think I talked about it a little bit during
3 that, but I wanted to make sure that my explanation
4 includes paragraph 67, as I've said. So just for lack
5 of clarity in answering that question, I wanted to make
6 sure that paragraph 67, what I say there talks about the
7 claim language as to how I got to paragraph 70.

8 ATTORNEY YANG: Okay, thank you. I have no
9 further questions.

10 ATTORNEY HWANG: Give me one second. I'm
11 actually reading paragraph 67. No further questions.

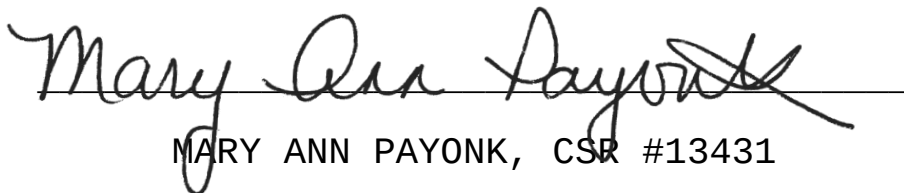
12
13 (Deposition adjourned at 3:04 p.m.)
14
15
16
17
18
19
20
21
22
23
24
25

- REPORTER'S CERTIFICATE -

I, MARY ANN PAYONK, shorthand reporter and Notary Public, CA CSR No. 13431, do hereby certify that the witness whose deposition is hereinbefore set forth was sworn by agreement of all parties, that the proceedings were reported stenographically by me, and that this transcript is a true, correct, and full record of the testimony given.

I further certify that I am not related to any of the parties to this action by blood or by marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 5th day of May, 2025.

A handwritten signature in black ink, reading "Mary Ann Payonk", is written over a horizontal line. The signature is cursive and stylized.

MARY ANN PAYONK, CSR #13431

Virginia Notary Registration No. 219251

My Commission expires 8/21/2026

ERRATA SHEET FOR TRANSCRIPT OF: DR. RAJEEV SURATI

CASE CAPTION: Vizio vs. Multimedia (PTAB)

DEPOSITION DATE: April 28, 2025

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Page	_____	Line	_____	Reason	_____
From	_____			to	_____

Signature of Deponent

Date

1 I,

2 DR. RAJEEV SURATI,

3 state that I have read the foregoing deposition and
4 declare under penalty of perjury:

5 That the foregoing is my deposition under
6 oath;

7 That I have read same and have made the
8 necessary corrections, additions or changes to my
9 answers that I deem necessary;

10 That my answers as indicated are true and
11 correct.

12 Executed at _____
13 this _____ day of _____, 2025.

14
15 _____
16 DR. RAJEEV SURATI
17
18
19
20
21
22
23
24
25

<u>WORD INDEX</u>			
< \$ >	16 17:12	14, 18 88:1	50:10 51:16,
\$665 14:16	21:22, 24	2100 85:5	19
	37:19 59:11	2104 85:1, 4,	38 4:8
< 1 >	17 59:14, 23	7 86:2 87:8,	384 14:4
1 42:12, 21,	60:9, 24	21 88:1	26:9 61:8,
24 49:22	62:12, 16, 19	2108 88:6, 22,	11 62:10
55:2, 9, 12	63:9 64:2	24 89:4	65:19 66:7
60:25 61:2	66:1	2112 88:8	68:12 83:18
65:5 66:14,	1716 62:3	2116 85:1, 7	84:6, 14
25 67:1, 21	1724 60:7	86:3 87:8,	86:24 87:14
68:15 69:3,	62:2, 5, 12,	22 88:11	89:12 92:13
20 71:14	17 63:9, 13,	2120 85:2, 5	39 43:17, 23
97:24 99:11	17 66:1	2191 1:25	44:14 45:12
10 15:8	1728 62:2, 5,	219251 108:18	
17:16 21:24,	13, 18, 25	22 104:23	< 4 >
25 22:5	63:2	22182 3:6	4 70:7, 13,
33:17 35:8	18 19:20	23 87:4, 6	18, 21 71:25
84:5 86:9, 10	47:1 66:6, 7,	24 87:4, 5	72:12, 17
100 8:3	15, 19, 24	25 83:21	73:2 74:3,
1001 4:9	67:20	84:2	13, 17 75:13
14:8, 12, 13	1808 62:1	26 4:10	76:21 77:3,
1003 4:10	1812 62:3	270 3:5	10 81:20
26:21 27:3	1905 65:4	28 1:19 2:4	83:2 85:23
1018 4:11	1F 97:15	109:3	40 90:12
47:5, 7	1G 98:7		41 42:7
1023 96:8	< 2 >	< 3 >	43:13, 14
97:19 102:22	2 8:4 55:9,	3 23:4, 24	95:13, 23
105 4:5	16, 17 65:8,	27:6, 13	43 61:11, 17
109 93:9, 23	10, 13, 16	42:13 52:20	44 49:17, 20,
11 4:12 96:4	67:2 68:2	68:2 70:19	22 50:4
11:30 2:5	71:5, 8	85:23	61:11, 17, 20,
11:35 5:13	99:14 105:1	3:04 107:13	24 62:13
112 94:22	20 35:13	30 90:11, 12	45 93:15, 16,
113 95:5	2002 4:12	32 38:16, 17,	22 99:22
118 76:8, 13	11:11, 13	19 39:3, 6,	100:19 101:1
13 37:19	13:7, 11	25 65:7	46 84:14, 21
61:20, 23	34:2 52:23	32:12:38 39:8	86:24 87:1,
105:4	2012 33:1	33 6:2	4 88:15
13431 2:10	2025 1:19	40:13, 17	94:12 101:17,
5:2 108:3, 17	2:4 108:14	35 41:1	21
14 4:9 35:7	109:3 110:13	42:4 43:7	47 4:11
15 84:21	21 48:19	63:25 64:1,	41:4, 7
87:4 88:15	83:21 84:2	4 65:3, 6, 8,	48 94:19, 22
96:7 105:17	85:4, 19	13, 15, 22, 25	49 95:4
	86:1 87:11,	36 48:13	
		49:7, 10	< 5 >

5 4:4 19:19 70:8, 24 71:4, 7, 12, 14, 25 72:3, 12, 16 73:11 74:3, 4, 14, 17 75:13 76:5, 21 77:3, 10 80:5, 23 81:20 83:2 89:20 50 90:11 54 18:18 44:21 49:23 5800 3:11 5th 108:14 < 6 > 6 19:21, 22, 24, 25 21:20, 24 61 84:5, 12 62 84:12 633 3:11 64 71:17, 18 72:6, 24, 25 73:4, 14 66 53:4, 7 54:23, 25 55:10, 21 58:6 67 106:4, 15, 23 107:4, 6, 11 68 60:5 < 7 > 7 8:4 96:7 97:18 102:22 70 98:25 99:3 102:13 105:22 106:1, 2, 4 107:7 700 84:25 760 84:24	< 8 > 8 95:14, 24 96:1 8/21/2026 108:19 8607 3:5 < 9 > 9 26:3 33:22 84:5 9,578,384 1:12 14:2 90071 3:12 < A > a.m 2:5 able 45:6 78:12 79:11 accept 102:7 accepted 31:6 access 37:22 accord 80:18 account 37:6, 8, 20, 21 accurate 5:23 21:23 35:19 42:25 64:13 90:2, 3 accurately 102:13 acknowledge 2:12 acronym 18:16 action 76:4 108:10 Action/Adventure 41:20 actual 39:7 add 56:13, 23 58:3, 24 59:5 83:15 90:7 added 57:6 adding 58:14	additions 110:8 adjourned 107:13 administered 2:14 afternoon 5:11 ago 33:17 agree 43:15 51:2 60:24 62:7 64:1, 5, 14 65:6, 8 66:14, 23 67:19, 25 76:11 80:19 85:18 93:13 95:2, 11, 16 104:2, 12 agreement 2:8 108:5 ahead 7:23 34:12 51:7 95:21 airplane 10:14 Alarm 36:8 allowing 67:24 allows 48:4 aloud 87:3 alternative 69:24 alternatively 58:3 analysis 19:1 Angeles 3:12 Ann 1:24 2:9 5:1 108:2, 17 Anniliese 3:15 answer 15:4 21:15 23:18 29:1, 4 56:1 60:20 67:5, 9, 25 69:11 83:15 97:3 101:24	answered 47:19 51:13 93:20 answering 20:21 72:19 107:5 answers 33:20 81:16 110:9, 10 anyway 47:24 60:19 106:17 Apollo 105:4 apologize 98:20 app 10:3 40:20 APPEAL 1:2 appear 49:7 65:11 68:20 72:3 APPEARANCES 3:1 appears 11:11 41:19 53:21 Apple 40:16 47:12, 20 94:23 application 32:22, 25 36:17 38:24 48:3 applications 9:5 32:8 46:18 applied 19:12 apply 19:14 80:11 applying 100:15 appreciated 11:3 appropriate 50:17 60:11 Approximately 6:1 17:3 31:10, 16
---	--	---	--

35:3	19:3, 8, 16	19, 22 105:8,	29:16 103:18
apps 9:13	20:8, 15	14, 16, 21	basing 106:24
April 1:19	21:2, 6, 14,	106:16 107:8,	basis 56:13
2:4 109:3	16 22:9, 15	10	58:14 77:15
argument 29:21	26:23 28:22	attorneys	beating 38:1
arguments	29:5, 9, 25	2:11 15:23	beginning
28:10, 11, 12	30:14, 20	21:7 22:7	8:10 53:13
Arrivals 40:5,	33:2, 9 37:7,	aware 5:24	BEHALF 3:2, 8
7, 10	9 38:6	25:14 92:16	6:6 15:1
arrive 20:6,	43:19, 22		80:14
24 21:11	44:5, 12, 24	< B >	believe 14:11,
art 60:1	45:1, 4, 14,	back 15:5	25 18:1
62:8 89:4	18 46:7, 10,	34:2 43:6,	25:19 26:10,
92:16 102:15	13 47:9	17, 20 44:7,	14, 20 34:11
Aside 15:18	48:2, 7	9 45:11	36:21 44:10
59:6	50:11, 15, 21,	50:9, 14	47:5, 13
asked 6:20	25 51:5, 8,	51:16, 23	50:7 58:23
7:13 16:1,	11, 14, 15, 25	52:10 71:14	63:15 64:24
25 28:13	52:4 55:24	76:19 86:22	65:1 82:22
51:13 72:20	56:2, 10, 12	90:25 91:16	89:19 96:3
81:11, 12	57:1, 5, 9, 12	98:19, 25	98:2 103:19
100:2 106:5,	59:2, 4, 8, 9	102:22 103:18	105:1
10	61:1, 4	background	benefit 9:20
asking 24:11	63:23, 24	24:15, 17	best 8:14
25:8, 9	66:4, 5, 16,	25:5 29:10	57:11 90:1, 3
50:22 77:7	20, 22 67:14,	30:12	better 39:17
81:14 99:4	18 68:18, 22,	backwards	60:16, 22, 23
aspects 28:14	25 69:2	27:16 44:3	72:6 91:18
assistance	73:10, 12	Bad 45:13, 15	big 86:8
21:12	74:21, 25	bandwidth	bit 16:2
associated	78:10, 15, 24	31:24	56:17 64:4
19:1 37:20	79:7 80:7,	bar 85:2, 5	71:7 72:6
53:23 54:10	10 81:9, 18	barely 65:5	76:4 78:16
56:5, 24	82:10, 13	based 7:11	86:23 107:2
58:2, 8, 17,	86:7, 11, 14	29:2, 21	blanking 66:17
25 99:19	91:22 92:23	33:4, 19	blood 108:10
assume 6:19	93:1, 6 94:6,	38:12 43:12	blow 11:11
38:15 103:21	11 96:16, 18,	56:24 57:13,	BlueBear 3:15
assuming 37:22	20, 23 97:10,	17, 20 65:9	BOARD 1:2
attempt 57:17	12, 22 98:1,	68:11, 14	18:2, 3, 7, 20,
attention 15:5	13, 19, 22	78:4 97:8	22 50:23
Attorney 4:4,	100:10, 17	106:11, 13	51:1, 6, 9
5 5:9 7:21,	101:4, 8, 15,	basic 6:10	102:6
22 11:15	23 102:5, 9,	10:24 33:11	board's 104:17
14:10 16:11,	11, 17, 21	38:13	borderline
17, 24 17:2	103:6, 11, 16,	basically	60:13
18:11, 15	24 104:4, 7,		Boston 5:11

bottom 38:19	categories	83:5, 7	collection
39:7 49:7,	48:25 84:4	89:20 100:9,	41:8 62:1
10 72:23	cause 88:24	11, 13 102:1,	67:23 68:3,
89:10	Center 3:5	12 103:13	11 69:5, 14
box 63:9	certain 6:23	104:3, 14	column 61:20,
65:10	24:22 28:14	106:14, 21, 22,	24 62:13
boxes 63:18,	certainly	25 107:7	84:14, 21
20	30:17 75:9	claimed 20:3,	86:24 87:4
bracket 55:2,	92:20	25 66:24	88:15
12, 16, 17	CERTIFICATE	67:20 72:11	columns 61:10,
99:11, 14	108:1	75:14	11, 17
brackets 55:9	certify 108:3,	claims 53:21	come 8:3
break 6:11	9	62:10 69:9	17:24 77:22
43:9 44:23	change 33:7	70:7 71:25	91:18
46:8, 15	71:19 73:23	72:12 73:23	comes 22:24
72:21 85:21	74:13, 18	74:3, 13, 17	comfortable
86:8, 15, 23	83:23 84:8,	75:13 76:21	81:17
92:24 98:16	11 99:5	77:3, 9, 10,	coming 44:21
breath 9:22	changes 110:8	25 81:20	Commission
bring 61:15	changing 74:9	83:2 97:9	108:19
browser 31:25	chase 52:14	clarification	communicate
bunch 92:21	choices 40:2	37:4 72:9	10:11 46:15
business 32:3	claim 17:21,	106:6, 11, 13,	86:15
button 9:18	24 18:21	23	communicating
50:14 79:23	19:4, 6, 13,	clarify 28:3	86:18
80:17 83:24	19, 21, 25	54:12 57:10,	Company 45:13,
84:24 85:6	20:14 29:12	13, 17 58:19	16 90:6
88:3, 6, 8, 11	55:4, 5, 23	72:23 73:19	compared 7:13
89:13, 21	56:9 57:8,	clarifying	compensated
buttons 88:19	18 58:12	54:19	14:16
	60:25 61:2	clarity 107:5	completely
< C >	66:14, 25	classes 90:21	16:16
CA 2:10	67:21 68:15	clean 67:16	comprising
3:12 108:3	69:3, 10, 16,	clear 50:25	70:19
California 5:2	20 70:13, 18,	67:6 73:20	computer 9:4
call 5:13	19, 21, 24	105:4	10:8
50:23 51:2, 6	71:4, 5, 7, 8,	click 9:6	concept 76:5
called 5:5	12, 14, 18	89:10	conclusion
8:23	72:16, 17	close 9:6	77:22
CAPTION 109:2	73:11 75:9,	10:3, 6	concomitantly
CARMICHAEL 3:4	12 76:5	91:18 93:3	15:25
Case 1:11	78:4, 6, 22	coaching 51:3	conference
12:22 15:22	79:13, 15, 24	Cobra 96:10	8:23
16:12, 20	80:2, 5, 23,	97:20 98:7,	confirm 40:19
74:22 83:13	24 81:4, 24	8 102:24	70:13
89:9 109:2	82:4, 9, 11,	Coleman 3:15	consider
casual 6:11	12, 15, 17, 22		25:24 26:17

81:10, 11	46:2 48:4	34:17 37:23	21 101:2, 18,
94:9 103:22	49:1, 11	38:22, 23, 25	19, 22 102:8,
considered	51:18 52:18	39:23 40:2,	16 104:18
19:13 23:8	53:9, 18, 21,	5, 6, 8, 11, 22	105:6 108:7
78:21 96:6,	23, 25 54:6,	41:10 42:1,	110:11
19 97:1	8, 13, 14, 17,	5, 6 43:7, 14,	corrections
considering	20 59:16, 25	18, 25 44:4,	110:8
72:21	62:1 63:3	10, 15 45:7,	counsel 2:9
consist 95:2	71:20 73:23	13, 20, 21, 23,	17:19 21:12
consistent	74:9, 13, 18	24 47:3, 21,	50:15, 16
19:1 46:1	84:2, 9, 11	25 49:12, 18,	count 79:5
64:1 65:18,	106:8	19 50:6, 7,	couple 45:2
25 66:14, 19,	contention	10 51:4, 20,	court 9:20
24 67:20	96:22	24 52:6	15:22 18:16
93:18 106:14	contentions	53:14, 18	covered 94:8
constructed	26:8, 11, 18	54:6, 23	covers 55:5
17:18 89:8	29:19	56:9 57:8,	craft 32:17
construction	Contents 19:18	15 58:12	created 17:7
17:22 18:8	context 62:10	60:10 62:5,	CSR 2:10
19:13, 20, 21	continue 50:22	6 63:7, 10,	108:3, 17
20:1 53:12,	control 75:19	21 64:9, 20,	curious 36:12
17 54:23	84:24, 25	23, 24 65:3,	98:5
55:1, 10, 20,	conversation	16, 19, 23, 24	currently
21, 25 56:3,	10:25	66:2, 3 68:4,	61:5 85:3
14 57:7	conversations	5, 8, 12, 17,	90:9
58:6, 15	91:23	21, 24 69:7,	cut 52:13
59:15 99:5	copies 11:23	18, 19, 22	CV 89:24
100:9, 12, 13,	12:22	70:1, 2, 5, 6,	90:4, 7
24, 25 101:11,	copy 12:2	15, 22 71:1,	
20, 25 102:1,	13:7 22:12	4, 12, 13	< D >
3, 4, 7, 12	61:17 62:22	73:24 74:10,	DATE 109:3, 24
103:8, 13, 14,	70:11 87:16	14 76:6, 7	day 5:15
20 104:14, 17,	99:1	77:1, 14	97:5 108:14
18, 21 106:7	Correct 6:14	80:18, 21	110:13
constructions	12:24, 25	81:2, 20, 21	dead 38:1
17:24 18:4,	13:9, 10	82:15 86:5,	deal 86:8
21 19:4, 6	14:2, 3, 18,	25 87:22, 23,	deals 99:8
104:3	19, 25 16:7	24 88:4, 6, 7,	decide 27:11
construed 53:9	17:22 19:7,	9, 10, 12, 13,	28:4, 19
consulting	20 20:1, 4	16, 21 89:17,	29:6 56:19
90:10	22:3, 5, 6	22, 24 92:14	81:5
contact 91:6	23:2, 3, 21,	93:14, 24	decided 20:12
content 18:10,	24 25:10	94:16 95:1,	29:1
24, 25 21:10	26:13 27:4	10, 24 96:2,	deciding 67:23
32:8 34:9	30:23 32:9,	5, 15 99:6, 9,	decision 18:6
41:22, 25	10, 13, 14	12, 15, 16, 20,	19:10 22:19
43:25 44:11	33:14, 20, 21	21 100:6, 9,	29:24 93:19

100:14	delineate	detail 18:9,	difference
101:14 102:2	56:20 58:16	23 21:10	6:25 7:17
103:10, 12, 15,	delineated	53:8, 20	different
23 104:2, 6,	60:4	54:22 55:1,	24:16 35:8
10, 24	delivered	6, 13 57:4	37:25 45:20
decisions	22:13 31:23	58:21 59:16,	48:25 49:6,
19:12 29:22	demand 18:17	20, 24 62:2,	11 56:16
declaration	32:8 54:21	5, 9, 13, 17,	72:19 74:23
11:7, 12, 17	demonstrated	25 63:2, 11	78:16 82:25
12:1, 20	52:9	67:2, 24	84:8, 11
13:8, 12	demonstration	68:4, 7, 11,	86:2 89:11
17:15, 17, 18,	36:16 47:20	17, 20, 24	differentiate
21 18:4	demonstrations	69:6, 17, 22	102:15
19:7, 17	30:2	70:4 75:11	digest 18:9,
22:1, 8 23:5,	depend 69:9	77:4 95:16	24 21:10
17, 19, 24	Deponent	96:1, 3 99:8,	53:9, 21
24:1, 3, 5, 10	109:24	11, 17 100:8	55:18 59:16,
25:2 26:4	DEPOSITION	101:1, 22	25 60:7, 9
27:2, 6, 13	1:17 2:7, 11,	102:4, 15	62:2, 4, 9, 12,
28:16 33:22	13 5:25	103:4, 9, 14	17 63:9, 11,
34:3, 7, 14,	6:23 8:7, 11,	104:17, 18	13, 17 64:2
20, 22 35:25	12, 17 10:10,	105:6 106:8	65:18, 22
52:16, 20	25 13:12	determinations	66:1 67:2,
53:4 59:11	21:17 22:17,	19:2	24 68:3, 7,
60:5 71:17	20 23:2	determined	10, 16, 20, 23
76:9, 14	24:12 28:2	18:23 104:13	69:6, 17, 25
85:10 93:7,	34:16, 25	device 31:12	70:4, 15, 20,
9, 16, 22	35:5 36:3,	40:16 47:20	22 75:11, 17
94:12, 21, 23	25 44:17	70:25 71:3,	76:10, 15, 23
95:13, 24	46:18, 24	5, 11, 20	77:4 93:13
98:11, 23	47:11, 13	72:2, 4, 14,	94:10, 15, 17,
99:23 101:14,	50:1, 18	17 73:6	25 95:9, 11
17, 21 102:13	86:19 107:13	75:17, 19	96:4, 6, 19
105:23	108:4 109:3	76:6, 10, 16,	97:8, 20
declare 110:4	110:3, 5	22 77:5, 13	98:4 99:9,
dedicated	depositions	78:14 83:18,	14 100:3, 20
90:10	6:5	25 84:3, 8	101:17
deem 110:9	DERBY 3:10	85:7 88:22	102:15 106:8
deeper 75:22	described	89:4, 13, 16,	dining 7:9,
defined 70:18	50:14 52:3	21 94:23	10, 14, 16
Definitely	65:21 88:15	devices 83:20	direct 73:7,
26:7 31:22	description	85:1, 19	8, 16 77:5
definition	54:9, 16	86:3, 5 87:2,	105:22
75:18 93:18	55:3 64:22	21 88:14, 18	directional
100:15	Desktop 8:18	90:7	83:22 84:23
definitions	9:16	dictate 69:5	directly
19:15			35:20 72:1,

12 73:5	DR 1:17 2:7	entitled 8:14	example 7:3,
74:3 78:13	4:3 5:4	20:22	4 14:21
disagree 51:5	22:20, 21	entity 13:20	40:25 45:5
disagreed	23:19, 21	environment	49:14 56:3
28:25	24:5, 10, 19	8:19	63:6 64:19
disclose 90:5	25:2 27:1, 6,	episode 42:21,	79:12 80:17
discuss 91:9	13 90:19	23, 25 43:2,	81:11 83:10,
100:13	105:22 109:1	5, 10, 16	12, 21, 24
discussed	110:2, 16	45:6 50:5, 6,	85:2
21:3 106:14	draft 22:8, 11	8 51:17	examples 24:2
discussing	drafting 22:1	53:24 56:18,	31:7 81:12,
60:6	34:7, 22	21 57:24	13 84:12
discussion	Drama 105:3	58:1, 7, 20,	85:19 86:4
20:10 107:1	Drive 3:5	24 64:20, 23	Excuse 91:17
discussions	12:15	65:2, 4, 6, 8,	Executed
22:10, 14	duly 5:5	10, 13, 16	110:12
displayed	DVDs 31:23	70:14, 20, 22	Exhibit 4:9,
42:16		72:1, 13	10, 11, 12
displays 85:4	< E >	73:5, 17	11:11, 13, 23
disposal 12:11	e.g 85:3	74:23 75:10	13:6, 7, 11
dispute 52:12	earlier 21:21	77:11 80:3,	14:8, 12
59:19 65:12	early 31:21	17 82:5	26:21 27:3
distinct 107:1	32:12	83:3 99:18	34:2 46:25
District 15:21	easier 11:7	106:7	47:1, 5, 7
disturbance	61:19 62:23	episodes	52:23 96:8
98:20	64:4 66:21	56:22 58:21	97:19 102:22
dive 75:22	70:11	63:21 64:11,	EXHIBITS 4:7
Docket 36:8	Eastern 2:5	16 65:23	23:21, 23
document	either 13:23	96:14, 17	24:6, 9 25:2,
23:15 26:24,	18:9 21:10	equally 80:11	5
25 28:19	26:12 42:3	ERRATA 109:1	experience
29:6, 7 104:8	50:9 53:8,	ESQ 3:3, 9	46:2
documents	13, 20, 22	established	expert 16:8,
12:8, 14	59:16, 24	99:4	9 17:14
22:16 23:11	62:2, 9 67:2,	estimate 6:24,	80:14 90:10
24:4 25:20	11 68:3, 10	25 7:8, 11,	experts 36:23
26:2 27:7,	69:17 70:3	12, 18 8:1,	39:21
11, 12 28:4	87:16 94:3	13, 14 15:8	expires 108:19
30:11	99:5 106:7	21:22	explain 56:15
doing 9:19	either/or	estimated	81:13 94:18
68:13 81:17	106:14, 24	21:21	95:3, 12
double-check	engaged 15:20	Examination	102:1 106:23
76:24 85:12	engagement	4:4, 5 5:8	explained
download 36:5,	16:14	105:20	83:25 94:10
6	Engine 8:23	EXAMINATIONS	100:12
downloaded	English 83:5	4:1	explains 75:8
35:8 36:1		examined 5:6	

explanation	83:14 85:10,	Figures 83:21	form 7:21
101:13 107:3	18 87:5, 9,	84:2	18:11 19:8
explicit 54:7,	12 88:20	filed 25:7,	20:8 21:2,
24 74:8, 11	89:1, 2, 7, 8,	12, 17	14 22:9
explicitly	13, 23 95:17	files 10:6, 7	28:22 29:9
55:25 56:11	98:3 105:7	36:1, 9	30:14 33:2
58:22 74:15	falls 60:24	filing 12:14	43:19 44:5
explore 8:6	familiar	final 71:18	45:14 48:2
69:11	24:18, 19	Finally 84:5	50:11, 16, 19
express 18:21	30:5, 6	find 62:23	51:25 55:24
44:18 103:20	32:22, 25	finder 10:2,	56:10 57:1,
104:3, 12, 13,	33:13, 16, 24	5 15:11	9 59:2, 8
21	34:9 36:24	fine 9:24	63:23 66:4,
extent 8:14	38:2 47:24	10:20 11:19	16 68:18, 25
	familiarity	12:20 27:15	73:10 74:21
< F >	32:16 36:25	50:20 51:11	78:10, 24
fact 31:4	far 17:4	61:16 97:5	80:7 81:9
58:16 65:12	21:23 23:16	99:1 102:20	82:10 100:10
77:16	78:18	finish 6:13	101:8, 23
facts 29:22	feel 75:2	first 5:17	102:9, 17
failed 36:9	81:17	14:22 22:7	103:6, 16
fair 8:24	feet 8:3	24:24 31:10,	104:19 106:17
14:22 16:4	felt 27:20	11 36:8	formal 103:14
23:25 25:1,	28:10 29:21	41:22 46:23	formed 84:6
16, 23 26:16	Fifth 3:11	66:18 69:22	forming 26:18
27:9 30:3,	70:24 74:4,	70:5 71:4,	forth 44:7
12 32:5, 19,	6 75:13	12 73:1	51:23 108:4
21, 24 36:15	77:6, 17	74:22 84:20	forwards 44:3
37:10, 11	78:1, 8, 22	105:18	found 18:20
41:23 42:18,	79:2, 4	five 9:13	55:22
21 43:3	80:20 81:1,	15:9, 11, 12	foundation
44:20 45:10,	6 82:7	37:25 46:10	33:2, 12
15 47:15	Figure 9:16	86:8 105:9	39:19 43:19
49:1, 2, 8, 9,	59:14, 23	five-minute	44:5 45:14
23, 24 52:8,	60:9, 24	92:24 98:16	50:11, 18, 21
19 53:10	62:12, 16, 19	floors 90:23	52:1
54:13, 25	63:9, 25	focus 83:23	founding 31:14
55:14, 18, 19,	64:1, 2, 4	85:3 97:18	four 9:13
23 57:16	65:3, 6, 8, 13,	follow 8:8	15:11 37:25
58:13 59:3,	15, 22 66:1,	Following	79:3 84:25
14 60:1, 7	6, 7, 12, 15,	25:12 75:14	85:19 86:4
61:3, 8	19, 24 67:20	follows 5:7	87:7, 24
62:14 63:3,	85:4, 19	foot 20:20	88:14
8 64:17, 21	86:1 87:11,	foregoing	fourth 70:14,
65:21 71:15,	14, 18 88:1	110:3, 5	19, 21 75:14
16, 21 73:21	95:14, 24	forever 91:5	78:2, 7, 17
74:18 81:19	96:1, 4 105:1		79:10, 19

80:3, 15, 16, 21 82:5 83:2 free 69:4, 8 freely 51:23 fresh 12:7 front 8:18 12:22 full 5:23 108:7 functioned 36:19 further 70:19 75:8 105:15 106:22 107:9, 11 108:9 < G > Game 64:6, 11, 16, 23 general 8:7 24:13 47:25 Generally 8:5 16:18 45:9, 25 46:1, 6 48:3, 5 55:17 75:23 Genre 41:19, 20 Genres 40:5 41:10, 12, 18 Getting 9:10 60:19 93:3 ghost 41:12 give 5:22 6:24 7:3, 4, 8, 11 8:10, 13 18:13 29:17 36:9 46:11 59:10 70:16 72:7, 15 81:16 84:12 103:25 105:9 107:10 given 24:2 29:22 40:25 108:8 giving 97:3	go 6:10 7:23 15:5 19:17 27:16 28:9 30:15 34:12 38:16 39:15 40:1, 4, 20 42:7 43:6, 17 44:3 50:9 51:7, 22, 23 52:10, 16 53:16 61:17 63:25 66:6 68:3, 10 70:7 72:1, 12 73:5 75:24 76:8, 13, 19 77:3, 11 78:13 84:13 86:22 87:14 90:18 91:2 93:1 95:21 98:25 103:18 105:12, 16 going 16:13 27:25 28:8 31:2 38:7 39:20 41:17 44:19 51:9, 16 61:13, 15 68:2 71:17 75:24 90:6 96:7 98:19 101:10 102:22 103:22 Good 5:10, 15 31:13 60:12 81:13 86:10 granted 24:22 great 11:16 12:8 86:21 106:1 greatly 11:3 ground 6:10 8:7 10:24 86:23	guess 5:15 7:1, 13, 15, 18 18:18 19:13 31:14 41:6 53:24 91:11 guesses 8:4 guessing 15:14 guy 92:4 guys 98:5 < H > half 6:4, 7, 8 35:12, 13 46:11 hand 108:14 handle 15:1 Hanks 105:3 happen 36:14 happened 79:6 happens 6:16 happy 50:24 hard 11:18 12:15 64:25 head 15:7 22:24 heading 23:7 hear 67:10 91:18, 19 93:25 94:2, 4, 6 95:18 Hello 94:5 help 8:1 31:1 32:17 71:7 helps 47:23 Henry 24:19 hereinbefore 108:4 hereunto 108:13 high 31:24 highlighted 40:8 65:10 hit 9:17 hold 61:2 honest 36:22	honestly 15:15 16:15 horse 38:1 Houh 23:21 24:5, 19 90:19 Houh's 22:20, 21 23:19 24:10 25:2 27:1, 6, 13 hour 14:17 35:13 86:11 hours 17:10, 13 21:20, 22, 25 22:5 house 7:15 8:21 95:7 household 37:16 huh-uh 60:16 huh-uh's 11:2 human 6:16 Hunleth 105:1 Hunt 95:24 96:1, 4 HWANG 3:9 4:4 5:9 7:22 11:15 14:10 16:17 17:2 18:15 19:3, 16 20:15 21:6, 16 22:15 26:23 29:5, 25 30:20 33:9 37:7, 9 38:6 43:22 44:12, 24 45:1, 4, 18 46:7, 10, 13 47:9 48:7 50:15, 25 51:8, 14, 15 52:4 56:2, 12 57:5, 12 59:4, 9 61:4 63:24 66:5,
--	---	--	--

20, 22 67:14, 18 68:22 69:2 73:12 74:25 78:15 79:7 80:10 81:18 82:13 86:7, 11, 14 91:22 92:23 93:1, 6 94:6, 11 96:18, 23 97:12 98:1, 13, 19, 22 100:17 101:15 102:5, 11, 21 103:11, 24 104:7, 22 105:8, 14 106:16 107:10 hypothetical 81:14 < I > idea 7:7 8:2 103:21 identified 23:12 identify 33:23 ii 33:23 image 38:19, 21 39:2, 22 44:9, 13 48:19 49:10, 20, 21 50:4 63:10, 16 64:5 65:25 66:1 93:10, 23 94:13, 23 95:4 97:6, 18, 20 99:25 101:16, 21 102:24 103:3 images 63:6 immediate 82:6 83:4 immediately 75:14 80:21 81:2	implicit 54:9 74:11 75:2 implicitly 74:17 implied 54:24 important 20:12 improper 51:3 inasmuch 19:12 include 30:2 41:22 44:7 63:2, 6, 10, 20 64:19 65:23 100:20 106:21 included 22:2 23:16 24:5 25:24 26:17 36:16 56:8 57:4 58:11 65:2 95:5 104:3 includes 17:21 23:7 41:25 55:1, 22 56:4 58:7 63:17 84:3 96:14 100:5 107:4 income 90:13 independent 29:19 INDEX 4:1, 7 indexed 11:14 14:9 26:22 38:5 47:8 indicated 110:10 individual 64:16 inform 59:24 62:7 informally 47:19 information 18:23, 25 33:11 53:24	54:10, 19 56:4, 24 57:23 58:2, 8, 18, 25 63:2, 20 64:8, 15, 19 65:23 96:14 99:18, 19 100:5 106:6 infringement 16:22 26:8, 11, 17 80:12, 13 96:22 initial 22:12 28:7 initially 22:13 inputs 77:21 inquiry 29:7 instantiations 33:6 institute 104:13 institution 18:2, 3, 20 19:10 22:19 93:19 100:15 103:12, 15 104:2, 6, 10, 15, 23 institution's 101:14 102:2 103:10 inter 84:3 interested 36:13 108:11 interesting 91:4 interface 40:22 42:4, 17 70:25 71:3, 5, 11, 20 72:2, 4, 13, 17 73:6 75:17, 18 76:5, 10, 16, 22 77:4, 13,	21 78:11, 14 83:18, 25 84:8 85:1, 5, 7, 19 86:3, 4 87:2, 21 88:14, 18, 22, 24 89:4, 7, 12, 16, 20 90:7 interfaces 33:7 87:8 89:9 interface's 83:20 intermediary 77:18, 20 intermediate 77:13 81:7 interpret 74:17 75:9 80:24 106:21 interpretation 81:20 interpreted 54:6 62:10 introduced 71:4, 12 introduces 76:5 invalidity 16:21 17:1 inventors 92:1 investing 90:16, 17 invoice 17:7 invoiced 17:3 involved 14:20 15:10 16:12 30:2, 23 32:16 92:17 96:21, 25 involving 14:21 15:18 16:10 26:9 92:13 IP 3:4
--	---	---	--

<p>IPR 6:5 11:11 17:5 29:14 30:2 35:4 38:8 89:24 91:3 97:1, 19 IPR00723 11:24 IPR2024-00723 1:11 13:8, 17 IPRs 6:3 14:21 15:1, 4, 12, 22, 24 issue 8:6 15:4 20:14 35:4 50:24 item 18:24 63:3 items 40:21 42:20 44:3 49:11 It'll 60:23 < J > Job 1:25 jointly 17:18 < K > Kai 96:10 97:20 98:7, 8 102:24 keep 27:25 91:6 kids 10:20 37:14, 18 kind 9:22 10:14 20:17 24:19 31:1 32:7 35:8 36:13 47:19 50:2, 17 56:19 60:3, 13 65:9 72:21 76:19 86:23 92:22 knew 24:22 91:1 92:19, 20</p>	<p>know 5:10, 25 6:9, 11, 16, 17, 19 7:9, 10 8:15 9:11, 22 10:16, 18, 21 11:1, 8 13:12 14:20 15:3, 6 16:15 20:11, 19 22:25 23:16 24:15, 21 26:25 29:11, 14 30:15 31:5, 18, 25 32:4, 11, 15 33:7 35:6, 7, 13, 16 36:25 37:1 39:14, 21 41:14, 15 46:7, 24 47:2, 15, 23 48:25 55:5, 16 56:17 62:22 75:8 76:1 79:3 81:16 82:19 84:16 85:14 86:7 87:15 91:3, 5, 24 92:1, 3, 12, 19, 23 105:8, 25 knowledge 7:12, 25 8:15 30:22, 25 90:1, 3 knows 37:3 44:19 < L > laboratory 90:23 lack 107:4 language 55:23 56:9</p>	<p>57:6, 8, 23 58:7, 12 75:12 78:4, 6 79:15 82:18 83:5, 8 106:14, 22, 25 107:7 laptop 8:18 11:21 Law 3:15 lawsuit 26:3 lawsuits 26:18 laying 33:12 50:17 lead 68:16 69:21, 25 leading 68:17 106:16, 17, 18 left 39:7 41:13 46:22 63:10, 16 64:5 legal 90:10 legible 65:5 length 7:9, 10, 11, 14 35:16 Level 67:1, 2 68:2 LG 14:21 15:2, 15, 19, 21 16:10, 13, 16, 18, 19 26:12 92:11 license 5:2 lim 73:25 74:1 limitation 35:11 56:4, 8, 13, 23 58:11, 15 59:5 69:10 70:2 71:3, 11 73:22 74:2, 12 limitations</p>	<p>55:22 79:25 limited 28:15 line 6:13 61:20, 23 84:21 87:4 88:15 109:3, 6, 9, 12, 15, 18, 21 lines 87:4 link 73:8, 16 links 35:21 list 15:12 25:20 28:8 29:1 30:16 52:18 listed 23:15, 23 26:3 27:12 28:1 lists 27:7 literally 82:12 litigation 16:10 26:9 92:8, 11, 13 little 11:18 16:2 56:17 64:4 71:7 72:6 75:22 78:16 85:24 86:23 93:2 95:19 97:3 102:18 107:2 LLP 3:10 located 75:17 76:23 long 7:16 8:2 35:15 longer 8:3 35:15 look 12:21 15:5 18:13, 15 25:8 27:17 28:9, 23 30:19 31:1 35:22 52:10 62:25 70:11 75:19</p>
---	--	--	---

77:22	81:12	making	19:11	meant	56:16	80:15	91:24
87:16	93:17	50:22	51:12	57:11	67:13	MMT's	26:17
97:2, 5, 14		55:13	61:14	97:24	103:21	mode	10:14
103:7, 19		68:17	78:8	106:20		model	32:3
104:5	105:11	103:22		meet	69:9	mom	37:3, 8
looked	15:3	manner	77:5	79:13, 24		moment	89:18
22:18, 19, 20,		marked	11:13	90:24	92:3	Monday	1:19
22	24:4, 14,	12:6	14:8	member	32:6	2:4	
15	26:10	26:21	47:7	mentioned		morning	5:10
27:20, 22		62:17		24:20	102:19	move	10:21
28:24, 25		marriage		menu	39:25	11:24	20:16
29:1, 17		108:11		40:2, 16, 21		28:17	33:10
33:5	35:1,	Mary	1:24	42:20	44:3	38:2	100:18
24	42:18	2:9	5:1	45:11	48:25	movie	42:4
43:6	47:14	108:2, 17		49:6	50:9	45:16, 17, 19,	
57:2		master	67:22	menus	50:9	23	56:18, 21
looking	15:16	materials		51:19, 24		58:3	63:7
23:4	28:10	22:2	23:8	message	10:19	70:25	72:2,
34:4	35:14,	27:7	36:6	messages	10:15	13	73:6, 9,
17, 25	36:1	85:6		met	70:3	17	74:5, 7,
40:23	44:14	matter	16:1,	79:13	92:5	24	76:17
61:22	62:19	19	26:12, 13	method	70:18	77:12	79:12,
73:7	86:1,	38:4	86:9	mic	91:18	23	80:5
24	87:1, 20	91:12	108:12	mind	31:17	81:2, 5	82:7
93:15	97:19	matters	15:18,	mindful	9:25	83:4	102:20
98:14	99:3,	19	16:10	mine	17:20	movies	32:4
22	100:19	26:9	91:13	MINGHUI	3:3	40:10	42:1
102:24	104:23	92:13		minute	42:12	84:4	88:6,
looks	39:3	mean	7:2	49:22		25	89:5, 10
41:12	42:12	10:18	15:20	minutes	35:13	moving	67:1
97:23		16:12	18:5	44:22	46:10	94:12	
loose	56:17	19:11	20:9	86:9, 10		MPEG	36:9
Los	3:12	27:17, 25		105:9, 17		MPEGs	36:12
lot	15:16	31:8, 22		missing	34:21,	muffled	95:19
79:16	81:15	33:3	35:15	24	35:10	MULITMEDIA	1:8
loud	62:14	39:9	44:6, 7	46:24	47:10,	Multi	15:21
84:20		45:16	51:9	16, 19	48:10	Multimedia	
lunch	91:8, 20	57:2	59:18,	52:5	90:4	13:23	109:2
		25	67:1, 22	misspoke	58:5	multiple	56:22
< M >		75:23	79:2	MIT	8:23	muted	93:25
MacBook	8:20	81:24	82:23	24:19		< N >	
mail	32:4	103:17	106:21	mixed	106:3	name	5:1, 16,
main	89:6	meaning	21:7	MMT	13:23	17, 18	37:19,
maintains		54:12	89:16	14:21	15:2,	21	
53:12, 17		means	21:24	19, 24	25:24	navigate	52:2
majority	90:14	53:22	55:4	26:3	29:19		
		77:17	84:10				

<p>84:8, 11 navigated 84:2 navigation 85:2, 5 necessarily 24:23 74:23 necessary 29:11 104:14 110:8, 9 need 6:10 12:15, 17 13:2, 3, 4 18:20 41:14 44:18 50:21 51:1 73:8 104:5 106:25 needed 22:4 24:6 needs 73:5, 16 neither 70:4 Netflix 30:2, 5, 6, 7, 9, 12, 17, 18, 22 31:1, 4, 7, 8, 9, 11, 14, 22 32:2, 11, 22, 25 33:13, 16 35:17 36:17, 19 37:1, 8, 16 38:2, 24 39:23 40:17 41:3 44:2 46:2 47:13, 16, 21, 24 48:9 50:13 79:16, 22, 24, 25 92:21 93:10 97:11, 25 never 7:15 15:3 36:12 39:20 91:9 92:5 new 26:25 40:5, 7, 10 44:11 46:3,</p>	<p>17 night 31:9 nonexpress 102:3 nonresponsive 28:17 100:18 Nope 86:17 normal 10:25 normally 8:8 no's 11:2 Notary 2:10 108:3, 18 notated 34:13 notes 93:1 Notice 2:8 notion 106:24 number 5:2 8:4 14:13 24:1, 14, 16, 17 27:7 55:2, 12 65:4 88:1 numbering 77:19 numbers 36:10 < 0 > oath 2:14 5:19 110:6 Object 7:21 16:11, 24 18:11 19:8 20:8 21:2, 14 22:9 28:22 29:9 30:14 33:2 43:19 44:5 45:14 48:2 50:11, 19 51:25 55:24 56:10 57:1, 9 59:2, 8 61:1 63:23 66:4, 16 68:18, 25 73:10 74:21 78:10, 24</p>	<p>80:7 81:9 82:10 96:16, 20 97:10, 22 100:10 101:23 102:9, 17 103:6, 16 104:4, 19 objection 2:13 50:16, 23 51:6, 7 101:4, 6, 8 106:16, 17 objections 51:1, 3, 12, 13 obviously 9:7 21:4 28:1 occasion 90:24 occur 75:13 80:20 occurring 52:9 78:1, 23 occurs 79:5 OFFICE 1:1 36:10 42:17 43:5, 10 45:6 79:19 80:18 off-the-cuff 81:16 97:3 Oh 9:19 10:4 17:12 19:22 20:23 24:14, 23 32:2 37:17 44:25 52:25 53:16 54:15 63:14 72:7 86:1 91:8 94:4 95:21 101:5 106:1 Okay 5:15, 25 6:3, 9, 23 8:9, 16, 21, 24 9:4, 10 10:7, 10, 12, 18 11:6, 16, 20 12:4, 8,</p>	<p>13, 16 13:1, 22 14:11 15:13, 23 16:8, 18 17:9, 12 18:14 19:25 20:16 21:25 22:5 23:4, 18 25:1, 16 27:14 30:1, 5, 11, 21 32:18 33:10 37:12, 18 38:3, 9 39:12, 19 41:6 42:7 43:11 44:25 45:3 46:22 48:8, 11, 12, 16 50:1, 15 51:8, 14 52:24, 25 54:4 58:4, 11 60:5, 15, 18 61:7, 10 67:8, 17 69:11 70:9, 12, 18, 20 71:10, 25 72:7, 10, 19 73:13, 19, 21 74:4 76:15 78:17 79:19 80:11, 14 81:19 83:14, 24 84:13, 17, 19, 23 85:6, 8, 16, 20, 23 86:7, 15, 18 87:14, 18, 20 88:18 91:11, 14, 23 92:1, 10, 23 93:8, 20 94:7 95:21 96:7, 9, 11 97:7, 14 98:3, 8,</p>
--	---	--	---

<p>13, 19 99:8 100:18 105:2, 8, 16 106:4, 5, 19 107:8 old 37:18 older 36:23 90:22 once 45:19 ones 35:23, 24 open 9:5 10:7 12:14, 19 13:2 opened 15:11 46:17 operates 44:2 opine 80:13 opinion 21:5 27:1 29:18, 19, 21 53:7, 19 54:5 72:6, 8, 11, 24 73:4, 13 75:6 77:15 78:9, 22 80:2, 14 82:2, 3, 14 89:15 102:6, 12 103:3 opinions 16:9, 20 17:19, 22 20:3, 6, 7, 24 21:11 26:18 28:13, 14, 15 55:16 75:21 85:9 100:19 opposed 11:2 56:18 order 20:4, 13, 25 68:11 ordinary 60:1 62:8 89:3 102:14 original 55:22 56:9 58:12 outcome 108:12 outline 105:11</p>	<p>Owner 1:9 3:8 6:6 13:22 25:7, 12, 18 29:15 < P > p.m 107:13 pad 83:23 84:24 PAGE 4:2 19:20 23:4, 24 27:16, 17 34:4 38:16, 17, 19 39:25 40:13, 17 41:1 42:4, 7 43:7, 12, 17, 23 44:14 45:12 48:13 49:7, 10, 17, 20, 22 50:4, 9 51:16, 19 52:20, 21 59:11 69:12 76:8 93:15, 16, 22 94:12, 19, 21 95:4, 13, 23 96:7 97:18 99:22 100:19 101:1, 16, 21 102:22 104:23 106:1 109:3, 6, 9, 12, 15, 18, 21 pages 62:24 paid 15:5 paint 35:19 50:2 papers 11:22 paragraph 18:18 26:3 27:6, 13 33:22 53:4, 7 54:23, 25 55:10, 20, 21 58:6 60:5 71:17, 18</p>	<p>72:6, 24, 25 73:2, 4, 14 76:8, 13 84:5 85:9 87:7, 20 93:9, 23 94:22 95:5 98:25 99:3 102:13 105:22 106:1, 2, 4, 15, 23 107:4, 6, 7, 11 paragraphs 84:12 Parks 49:14 51:17 part 20:10 24:1 25:20 27:19 59:17, 18 60:6 61:14 62:11 66:18 73:1 81:25 83:9 89:6 95:5 97:19 107:1 partially 36:11 participating 2:11 particular 17:5 29:12 33:5, 6 34:13, 19 35:17 50:5 64:20, 23 69:9 92:19 parties 108:5, 10 parts 22:23 24:4 29:12 59:19 pass 105:15 PATENT 1:1, 2, 9, 12 3:8 6:6 11:24 12:12, 21 13:22 14:4,</p>	<p>13 22:19 25:7, 12, 18 26:9 29:15 56:16 58:22 59:20 61:6, 8, 12, 17 65:19 66:8 68:12 70:7 83:18 84:6, 14 86:24 87:15 89:12 92:13 patent-in-suit 14:1 patents 22:22, 23 91:23 92:2 patent's 62:10 pause 76:4 pay 37:22, 24 Payonk 1:24 2:9 5:1 108:2, 17 penalty 110:4 pending 6:12 people 10:19 percent 90:11, 12 percentage 90:9 Perfectly 61:16 perjury 110:4 permissive 83:10 person 52:8 60:1 62:8 89:3 92:5 102:14 personal 7:12 8:15 personally 92:3 Petition 4:8 13:2 25:9, 10, 12 27:2 38:4, 7, 16</p>
---	---	---	--

40:1, 13, 17	12 78:13, 14	34:15, 25	29:14 30:23
41:1 42:5, 7	79:10	35:5 47:11	92:17, 18
43:7, 14, 18,	playing 79:1,	preparing	proceedings
24 44:15	5, 10 81:2	21:19, 20	14:21, 24
45:12 48:13,	82:5 83:4	35:25 36:2	108:6
17 49:11, 18,	97:25	present 2:12	process 12:19
21, 22 50:4,	please 5:16	3:14 74:7	21:5
10 51:16, 19	6:19 66:6	76:16	professor 91:1
Petitioner	84:20	presented	profiles 37:25
1:6 3:2	PLLC 3:4	45:20 68:24	properties
13:19 15:2,	plus 21:24	69:6 88:25	54:18, 19
17 23:8	79:3	presents	proposed 18:3
52:22	point 31:6	18:23, 25	19:6 53:12,
phone 10:14	35:22 55:12	press 77:6	17 54:23
phrase 18:9	58:19 83:1	pretty 6:11	55:1, 10, 21
53:8, 13, 18	pointing 86:2	37:1, 3 38:2,	56:3, 14
58:24 62:9	points 88:3,	13 105:10	57:7 58:6,
102:8	6, 8, 11	previously	15 59:15
physical 12:2,	pop 46:3	11:13 14:8	99:5 100:9,
21 22:11	portions	26:21 43:6	23, 25 101:11,
physically	34:18 35:2,	47:7	20, 25 102:3,
2:12	17 47:14	primarily 32:3	7 103:8
pick 30:16	56:16	printed 11:23	provide 18:21
46:22	POSITA 53:19	12:7 13:4	19:4, 6 20:3
picking 10:20	80:9 82:21	prior 30:22,	22:7 28:12,
picture 35:19	102:14	25 92:16	13 53:7
50:2 62:16	position 51:9	priori 7:25	54:5 55:17
63:15	82:21	Pro 8:20	83:10, 11
piece 43:24	positions	Probably 6:4	provided 18:1,
44:11 51:18	25:24 26:17	9:13, 23	3, 8 20:7
pieces 23:19	possible 6:15	11:7 14:12	21:25 22:11
43:9	43:20 44:22	25:21 31:25	62:1 68:7
place 75:24	51:21 52:2	33:19 35:12	89:24 101:25
104:11	80:1 81:7	52:11 93:2	providing
places 84:1	possibly 39:10	102:19	16:9, 20
planning 17:8	precise 7:10	problematic	18:9 21:9
play 42:21,	preclude 78:1	10:2 27:21	32:3, 8 53:8,
23 46:4	precludes	proceeding	13, 20, 22
67:25 70:25	78:23	13:16 14:1,	59:15, 24
74:5 79:12	preliminary	17 16:6	74:6 90:10
80:17 81:6	18:22 25:6,	17:4, 11	99:5 102:7
82:7	13, 17, 25	18:8 21:23	106:7
player 43:3	103:21	23:12 24:13	PTAB 36:10
44:8 67:3,	preparation	25:3, 5, 7, 18,	109:2
25 74:6	28:20	25 26:5, 6,	PTE 1:8
76:16 77:11,	prepare 21:17	19 27:8	Public 2:10
	22:16 23:1		108:3

purely 57:20 106:11	106:17 107:9, 11	83:11 109:3, 6, 9, 12, 15, 18, 21	referring 13:17, 20, 24 14:5 87:11 89:21
purpose 36:13 97:1 104:15	question's 73:1	recall 16:13 35:10 40:23 106:5, 10	refers 62:4
purposes 18:19	quick 48:16	receive 10:15 71:19	reflects 102:13
pursuant 2:8	quit 9:17	receiving 70:14, 19, 21, 24 73:22 74:4, 12	regard 16:14 28:13 77:20
push 79:23	quite 10:25 36:23 39:15 53:25	recite 68:15	regarding 20:24
put 10:14 34:19 62:21 69:3 85:2	quote 37:20 79:3	recited 73:23 74:13	Registration 108:18
< Q >	quote-unquote 13:16	Recess 46:12 86:13 93:5 98:18 105:13, 19	relate 30:12 59:20
qualifies 93:13 94:15 95:9 100:2	< R >	recites 70:13, 21, 24	related 25:5 30:18 35:17 71:8 90:7 108:9
qualify 94:25 97:8, 20 100:8 101:1, 12, 22, 25 102:2 103:4, 9, 10	RAJEEV 1:17 2:7 4:3 5:4, 17 11:12 109:1 110:2, 16	recollection 25:21	relates 19:25 54:1 55:13, 17 99:11, 14
question 6:12, 18, 20 9:12 17:9 19:23 21:9 28:4, 18 29:4 31:13 32:20 33:20 39:22 40:19 54:2 55:8 58:4 60:12 72:20, 22 76:1 77:1, 8 78:16 85:15 91:11 93:21 95:20 97:4 107:5	R-A-J-E-E-V 5:18	record 5:16 14:11 34:2 48:8 50:25 61:24 62:14 67:6 84:22 87:3 98:20 105:17 108:7	relating 26:2 relation 92:8 relevant 23:17 27:22 29:2, 3, 7, 13 34:14 35:1 91:3
questioning 6:13	rate 14:16, 24	record's 85:24 105:4	relied 92:17
questions 11:1 13:15 20:21 32:17 38:13 45:2 46:14 48:11 50:22 76:20 81:17 93:3 105:10, 15, 17	reach 75:4 read 11:18 12:22 20:13 29:2 39:10 51:9 57:3 61:23 62:4, 14 64:25 82:4, 21, 22 83:2 84:20 87:3 103:17 110:3, 7	Recreation 49:15 51:17	rely 60:6 75:3, 7 85:8
	reading 40:24 56:16 107:11	reference 74:8	relying 104:16
	ready 9:11	REFERENCED 4:7 11:14 14:9 26:22 38:4 47:8	remember 31:21 58:5
	real 48:16	references 92:16	remote 8:17 34:21, 24 35:10 46:24 47:10, 16, 19 48:10 52:5 75:19 84:24, 25
	really 15:3, 5, 16 29:11 33:11 64:25 73:7 90:25 99:8	referred 22:23 62:13	REMOTELY 1:18 2:7, 14
	reask 66:20 71:10 72:22		repeat 43:8
	reason 5:22 52:12 65:12		rephrase 17:9 54:3 55:8

58:4 77:8	17 26:2	run 65:2	46:3, 20
85:14 95:20	27:11, 12	90:17 92:21	48:14, 17
report 17:14,	28:4, 5, 19	runs 48:4	49:8, 17, 18
20 18:13	29:24 34:22,		52:17 53:5
19:15 20:11	24	< S >	59:12 61:5,
22:21 24:7	reviewed 22:4	sake 61:14	12 62:21
28:24 95:5	23:1, 11	Sanjiv 92:4	66:7 70:10
Reported 1:24	24:3 26:8,	satisfy 80:16	78:13, 14
2:9 108:6	15 27:8	saw 28:1, 2	89:6 93:11,
Reporter 2:10,	reviewing	31:7	17 96:8
12 5:1	22:2 29:7	saying 7:24	97:6 98:5, 9,
18:16 37:4	35:4	28:9 37:8	15, 23 102:25
67:10 91:17,	REX 3:9	53:19 54:17	104:9
21 94:2	right 9:3	56:17 63:11	screens 52:3
101:6, 9	12:5 20:20	68:19 71:25	98:13
108:2	25:11 27:3	72:15 73:25	screenshot
reporter's	28:3, 6 34:1	74:8 76:18	39:23 40:7
9:21 108:1	35:21 40:9	79:1, 4	41:3 42:9
represent 61:7	42:2 51:14	83:12 85:25	100:20
representative	52:11 64:11	says 19:18	scroll 40:5
64:6	65:5 66:9	39:8, 9, 10	41:20 48:24
representing	67:14 69:16	48:22 52:22	season 97:24
15:24	71:22 72:5	54:8 58:1,	second 9:7, 8
require 68:23	75:19 76:7,	22 65:1	18:14 41:25
71:19 72:1,	24 79:16, 20,	80:6, 9	59:11 65:15
12 74:17	21 80:12	81:24 82:11,	70:16 72:7,
77:3	82:14 85:11	12, 15, 22	16 76:25
required 81:4	87:2 91:24	83:6 97:23	84:17 93:15
requires 72:3,	95:25 97:25	103:19	95:17 103:25
18 80:2	98:14 99:10,	104:12 105:3	104:20 106:4
requiring	13 100:3, 4,	school 90:18,	107:10
72:16	22 104:11, 12	25 91:6	seconds 39:3,
respect 17:4	106:9	scope 16:11,	6 41:4, 7
22:1 23:12	role 16:19	24 50:19	42:13 48:20
respond 11:1	room 2:13	51:25 60:25	49:23
27:21	7:14, 16 8:23	61:1 73:10	section 19:19,
responding	roughly 7:20	81:9 96:16,	21, 22, 24, 25
27:20	round 12:9	20 97:10, 22	24:16 30:12
response 25:6,	row 41:22, 25	103:6, 16	93:2 102:1
13, 17, 25	65:15	104:4	sections 34:13
27:19 28:8	rows 63:17,	screen 10:5	see 9:6, 10,
74:6 93:25	18 64:15	11:9, 10, 21	16 11:6, 8,
retained 16:5	65:3	12:23 19:18	10, 16, 17
retread 86:23	rule 10:24	23:5 27:4	15:11 19:21
review 22:16	rules 6:10	38:10 39:7	22:18 23:5,
23:19 24:9,	8:7	42:16 43:21,	9 26:25
23 25:2, 4, 6,		23 45:17	27:3 28:9

29:13 34:2, 5 36:1, 6, 14 38:10, 17, 19 39:5, 6, 16, 22 40:14, 16 41:3, 7 42:9, 14 43:12 46:21 48:13, 15, 17, 21 49:24 51:1 52:10, 17, 18, 25 53:4 55:9 56:6 57:23, 25 58:9 59:11, 21 60:3 61:5, 6, 10, 11, 20 63:13, 18 64:4 66:12 72:7, 15, 17, 22, 25 73:2 82:20 87:18 88:1, 22 90:23 91:8 93:11, 23 94:13, 23 95:4, 7, 14 96:7, 8, 12 98:11, 23 99:25 103:1 104:8, 9 105:3 seeing 39:20 50:3 53:1 98:6, 7, 8 104:10 seeking 72:8 seen 36:12 51:24 select 42:3 43:24 45:13, 17 47:14 48:4, 25 50:5 51:18 61:25 69:17, 21 79:11	83:19 84:25 85:6 selectable 42:20 88:19 89:13, 21 selected 18:24 41:9, 12, 18 42:17 44:11 45:19 49:3, 12, 14 63:3, 7 65:9, 13 70:5 78:11 97:24 selecting 67:22 74:23 76:15 80:17 88:24 89:4 selection 42:23 45:22 68:16, 17 69:4, 7, 21, 25 70:14, 19, 22, 24 71:19 73:22 74:5, 6, 12, 18 75:13, 14 76:9 77:17 78:1, 2, 7, 9, 17, 21, 22, 25 79:1, 2, 3, 4, 10, 18, 19 80:3, 4, 15, 16, 20, 21 81:1, 6 82:5, 6, 7 83:3, 4, 22 85:4 selections 81:7 send 12:18 sense 24:3 39:18 sent 26:14 sentence 61:23 62:3, 4, 7 66:18 84:21	separate 60:4 62:23 106:25 sequence 66:15, 23 67:19 series 19:1 42:4 53:23 54:9, 11 56:5, 24 58:2, 8, 17, 20, 25 63:21 64:6, 9, 12, 16 72:2, 13 73:5, 8 77:12 82:6 84:4 88:8 99:20 100:5 service 31:3, 22 services 32:2 set 18:25 35:7 53:22 108:4, 13 seven 46:11 seven-zero 106:2 share 11:10 48:16 87:15 93:7 sharing 26:24 46:20 48:14 66:7 SHEET 109:1 shift 32:12 shifted 32:7 short 64:22 Shorthand 2:10 108:2 shot 39:8 show 38:7 49:18 52:13 54:22 56:18, 20 58:3, 21 67:23 70:10 71:1 74:5, 7, 24 75:10 76:17 79:12	84:2 85:12 89:5 93:9 96:17 102:19 showcase 85:3 88:3 showing 34:2 44:9, 14 63:15 67:2, 3 shown 31:8 36:20 42:4 43:17 45:12 47:16 49:6, 7, 17 52:20 60:9 64:2 65:15, 22, 25 66:1, 15, 24 67:20 83:20 88:19 shows 38:24 40:11 41:23 47:20 49:11 62:12, 17 63:9 85:19 86:4 89:5 95:16, 24 96:1, 10 101:17 105:6 sidetracked 60:19 Signature 109:24 simple 73:2 simply 19:9 79:9 single 53:24 56:18, 21 57:24 58:1, 7, 19, 24 65:23 70:25 74:5, 7, 24 76:17 99:18 106:7 sir 14:15 41:24 47:22 61:9 64:18 81:3 86:20
--	---	--	--

87:25 94:20	75:3, 7, 8	62:15 63:4	substantive
Sirpal 92:4	81:23, 25	71:15, 21	27:19
situation	82:1, 3, 8, 17,	74:19 85:10,	suggest 68:19
69:10 81:14	22 83:1, 8, 9	18 87:5, 9,	Suggestions
SKIERMONT 3:10	84:7 106:11,	12 88:20	40:4
skill 60:1	20	89:1, 13	suggests 77:19
62:8 89:3	speeding 61:14	100:16	Suite 3:5, 11
102:14	spell 5:16	STATES 1:1	support 27:2
skimmed 35:9	spend 17:14	status 16:13	59:15 82:17
sleep 90:7	21:19 35:3		83:11 85:9
sloppy 102:18	90:14	stenographically	supported
small 11:21	spent 15:16	2:9 108:6	28:11 81:22
91:4	17:10, 13	step 77:18	82:1, 8
smart 31:3, 4	21:20, 22	steps 20:4,	supporting
Sorry 9:17	35:12 81:15	13, 25 44:7	83:13
14:6 15:21	spoke 91:14,	66:15, 23	supports 82:4
16:25 19:22,	16	67:19 71:18	83:2, 9
23 20:13	stage 18:20	77:13, 18, 20	SURATI 1:17
27:14 34:12	stand 18:17	78:1 84:5	2:7 4:3
37:13 41:7	54:20	stick 60:13	5:4, 17, 18
47:6 53:15	start 5:15	stop 30:13	11:12 105:22
55:4 61:2	27:14 79:18	85:8	109:1 110:2,
66:20 67:5	80:3 81:2	stopping 68:13	16
69:10 76:12	82:5 83:3, 4	Street 3:11	S-U-R-A-T-I
77:24 80:8	started 5:12	Strike 11:7	5:18
84:3 86:1	16:3 34:4	16:8 19:5	Sure 5:17
95:22 101:7	46:18 90:6	20:16 24:8	6:9 10:13,
sort 15:25	Starting	28:17 32:20	15, 17 13:7
sound 33:24	19:20 20:17,	33:10 45:25	15:18 16:15,
38:2 60:23	20 84:21	51:22 55:20	16 17:6
sounds 7:19,	88:15	61:10 65:7	20:19, 20, 23
24 12:21	starts 61:23	77:9 100:18	25:15 30:4
32:19 37:1	Startups	104:1	31:2, 15
source 57:18	90:16, 17	studied 24:18	34:5 39:14
59:6	state 5:16	stuff 35:9	44:1 45:15
speaking 8:5	71:18 110:3	47:18 91:10	46:5 52:21
16:19 45:9	statement	submitted	54:3 61:22
48:3, 5 51:2,	14:22, 23	11:6 13:8	62:11 65:17
6, 7, 12	27:9 30:3,	35:24	66:11 69:12
special 7:25	13 32:5, 20,	subscriber	78:25 79:25
54:16 89:16	21, 24 41:23	48:5	84:15 85:12,
specific 28:12	42:18, 21, 25	subscription	22, 23, 25
specification	43:3 49:1, 8	30:9 36:9	93:19, 20
56:25 57:3,	53:10 54:13	subsequent	98:14, 17
7, 14, 21	55:4, 5, 7, 14,	63:14	105:10, 24
59:1, 6 60:6	18, 19, 23	subsequently	107:3, 6
68:6 74:16	60:2, 7 61:8	44:11 79:11	swear 5:2

sworn 5:6	TECHNOLOGIES	think 13:6,	105:7, 8, 10
108:5	1:8	21 15:10	107:2
system 71:19	technology	16:14 21:1	thinking 81:15
72:1, 12 73:5	32:16 36:24	22:21, 23	This'll 9:8
< T >	Television	23:7, 14, 25	thought 23:17
table 7:9, 10,	41:19, 23	30:24 31:8	28:24 29:2,
14, 16 19:17	42:3 64:9,	32:10, 14, 23	3 30:16
23:7, 13	12 89:5	33:21 35:1	34:14 67:12
tables 8:2	tell 7:14	37:3, 7 41:8,	106:20
take 9:8	15:6	11 42:2, 6,	three 15:11
23:18 44:22	telling 82:11	19 43:4, 20	Thrones 64:6,
46:7 81:14	term 54:22	45:10, 15, 16,	12, 16, 23
85:21 86:8	55:1 83:17	24 46:6	thumbnail
92:24 97:2,	89:15, 20	47:1, 17	83:19
5 98:15	102:3 104:14	49:2, 9, 24	thumbnails
106:3	terms 18:5,	51:2, 12, 21	83:23
TAKEN 1:18	21 22:11	52:2, 11, 15,	tier 62:2
2:7 6:1	75:9 104:3	22 53:1, 11	time 10:3
25:24 39:3	testified 5:6	54:7, 15, 16,	15:16 21:19
46:12 86:13	testimony	24 55:3, 19,	24:18 31:10,
93:5 98:18	5:23 22:20	25 56:1, 11,	11 33:8
105:13, 19	108:8	15, 17 57:2,	35:3 65:2
talk 75:24,	Texas 92:4	16, 19, 22	81:15 90:9,
25 77:18	text 49:25	58:1, 13	11, 14 91:14
91:13	63:6 85:4	59:3, 10	105:14
talked 87:21	Thank 91:21	60:17 61:2	times 6:1, 2,
91:12 106:19	101:9 105:14	63:8, 14	23
107:2	107:8	64:21 65:5,	timestamp
talking 13:13	Thanks 46:9	21, 24 67:15	39:3 41:4
14:14 46:25	thing 6:12	68:5 69:1,	42:12 48:19
47:2 74:1	9:19 20:12	12 71:5	49:22
83:7, 8	21:9 24:24	72:16 73:11,	timestamps
100:24	27:21 37:24	15 74:11	34:19
talks 24:17	53:1 75:25	75:15, 18, 23	title 64:20
57:3 74:4	79:22 101:16	78:3 80:9	today 5:20,
75:9 77:17	things 6:9	82:19 84:1	23 6:11
87:7 107:6	8:13 9:22	85:8, 11, 17,	17:8 33:14
taught 68:12,	23:16 24:16,	21 86:2	34:16
14	17, 20, 22, 23,	87:6 88:21	today's 21:17
teach 68:6	25 27:22	89:2, 6, 7, 8,	22:17 23:2
teaches 84:7	28:24, 25	14, 23 94:7,	34:25 35:5
TechnoBuffalo	29:1, 18, 23	9, 17 95:11,	told 15:4
33:23 34:6	33:5 35:8,	17 98:3	Tom 105:3
35:9 36:15,	14, 23 57:4	99:3 100:11	top 15:6
20 38:22	59:23 60:4	102:10, 20	22:24 48:19
42:10	61:14 72:22	104:11, 20	49:6 86:11
	77:21 106:3		93:10, 23

94:13, 21
95:4, 14, 23
99:25 100:20
101:1, 16, 21
topic 20:10
totally 16:1
traces 71:14
TRADEMARK 1:1
transcript
67:16 108:7
109:1
transition
80:5
TRIAL 1:2
16:13
trick 19:23
28:18
tried 57:10,
13
true 14:23
46:6 108:7
110:10
try 28:8
46:22
trying 11:10
22:21 28:7,
23 31:18
33:11 54:12,
15 56:15, 20
58:16, 19
72:5, 23
75:21 79:8
turn 10:4, 13
TV 31:3, 4, 5,
7, 9 32:1
36:16 40:11,
16 41:4
47:12, 20
52:5 64:6
73:17 82:5
84:4 88:8
92:21 94:23
97:25
TVs 92:21
two 15:10
31:14 53:22
60:4 62:23

90:22, 23
98:13
two-minute
35:11
type 61:25
typed 36:10
typically
50:12
typo 59:10
Tyson 3:6

< U >
uh-huh 7:7
20:18 28:2
38:11, 14
42:8 47:4
48:1, 23
49:5, 16
52:7 53:15
60:16 61:18
69:15 88:5
92:25 102:23
104:25
uh-huh's 11:2
ultimately
17:19 21:5
71:14
unclear 85:24
uncomfortable
97:3
underlying
16:10
understand
5:19 6:15,
19, 21, 25
7:17 8:13
11:4, 5
13:16, 20, 23
14:5, 13
18:19, 22
28:6 36:19
39:2, 20
40:20 48:9
50:13 53:20,
25 65:20
72:5 75:21
77:1 89:4

understanding
18:7 31:1
33:4 39:13
75:12, 16
76:22 77:2,
9, 10, 25
79:8, 9
83:17 97:9
103:13 104:1
understood
6:20 19:9
31:2 41:11
UNITED 1:1
unrelated 16:1
uploaded 36:12
use 31:3
32:22, 25
33:13, 16
37:16 59:14
84:23 106:24
user 40:1, 4,
20, 21 41:9
42:3, 17, 23
43:2, 6, 10,
16, 25 45:6,
11, 12, 20, 22
48:24 49:3,
12, 14 50:5,
8 51:18, 22,
23 61:25
65:9, 13
68:10, 15
69:4, 20, 24
70:25 71:3,
5, 11, 20
72:2, 3, 13,
17 73:6
74:5, 7
75:16, 18
76:5, 10, 16,
22 77:3, 4,
11, 12 78:7,
11, 14, 20
80:4 81:7
82:4 83:17,
19, 20, 24
84:3, 7, 23

85:1, 2, 5, 7,
19 86:3, 4
87:1, 7, 21
88:14, 18, 22,
24, 25 89:4,
7, 8, 12, 15, 20
uses 84:7
89:20

< V >
VA 3:6
varies 90:11
varieties 84:4
variety 88:11
various 29:22
54:17 57:3
vendor 12:8
verify 41:5
48:9, 23 53:2
version 41:13
video 18:17
32:8 33:3
34:21, 24
39:4 46:24
47:2, 10, 16,
20 48:10, 20
52:5, 9, 13
54:21
VIDEOCONFERENCE
1:18 2:8
videos 22:18
24:24 30:1,
7, 18 33:6,
23 34:6, 10,
15 35:4, 20
36:2, 16, 20
38:22 42:10
92:20
view 18:9, 23,
24 21:10
41:8, 9 43:3,
6, 17 45:20
48:6 49:1
53:8, 9, 20,
21 54:22
55:2, 6, 13,
18 57:4

58:22 59:16, 20, 24, 25 60:7, 9 62:1, 2, 5, 9, 12, 13, 17, 25 63:2, 9, 11, 12, 13, 17 64:2 65:19, 22 66:1 67:2, 3, 23, 24, 25 68:3, 4, 7, 10, 11, 16, 17, 20, 23, 24 69:5, 6, 14, 17, 22, 25 70:4, 5, 15, 20, 22 75:11, 17 76:10, 16, 23 77:4 83:9 93:14 94:10, 15, 17, 25 95:9, 11, 16 96:1, 3, 4, 6, 19 97:8, 21 98:4 99:8, 9, 11, 14, 17, 18 100:3, 8, 21, 25 101:1, 17, 22 102:4, 15, 16 103:4, 9, 14 104:17, 18 105:6 106:8 viewed 43:2 45:13 viewer 42:24 43:24 Virginia 108:18 visit 91:2 VIZIO 1:5 13:19 15:15, 18 16:10, 14, 16 26:3, 13 31:5, 6, 9 36:16 41:4 91:24 92:20	97:25 109:2 Vizio's 15:21 VOD 18:10, 16, 24, 25 21:10 46:2 48:4 49:11 51:18 53:9, 18, 21, 22, 25 54:5, 8, 13, 14, 17, 20 59:16, 25 63:3 71:20 73:23 74:13, 18 84:2, 9, 11 106:8 V-O-D 18:17 vs 109:2 < W > want 11:25 12:18 20:17, 19, 20 23:18 32:15 38:15 39:12 48:8 50:2, 23 51:6 52:13, 20 53:2 61:7 69:12 73:19 90:4 91:17 93:17 98:14 105:18 wanted 28:12 43:25 76:24 82:23 107:3, 5 wants 69:4 watch 34:6 35:19 42:24 43:10, 25 45:6, 23 47:10 50:5, 6 51:19 79:23 watched 30:7 34:15, 18 49:4 52:5 watching 43:5, 16 46:2	50:8 51:17 79:18 way 9:14 12:6 30:1 35:6 47:11 64:24 69:3 76:1 82:25 85:20 92:22 108:11 web 24:24 weeks 91:16 92:5 weird 98:15 Well 5:15 12:19, 23 13:3 18:5, 12 19:5 22:10 24:8 29:10 31:16 35:21 37:1, 3 50:25 66:7 74:20, 22 79:24 81:8 93:17 95:2, 3 went 34:2 36:8, 10 45:5, 11 We're 6:16 10:18 20:17, 19 52:21 53:1 61:22 69:12 76:2 80:18 93:3, 15 West 3:11 Westwood 3:5 WHEREOF 108:13 wife 10:19 window 10:5 WITNESS 4:2 5:3, 5 37:5, 7 44:21, 25 45:3 46:9, 11 51:3 66:17 67:12, 17 86:10, 12	91:17, 20 92:25 94:4, 7 98:17 101:5, 7 105:15 108:4, 13 word 73:7 words 18:12 19:11 44:2 work 14:17 15:20 16:1, 25 worked 15:19, 23 24:22 47:16 48:9 working 16:2 17:14 works 14:6, 7 40:20 47:24 50:13 workspace 8:23 world 91:4 worth 36:23 write 17:17 24:6 29:18 105:18 writing 9:21 20:11 23:17 100:14 written 9:23 57:14, 18 64:22 67:15 82:1, 2, 24 101:12 wrong 9:17 wrote 19:9 24:20 28:15 29:3 100:11 101:13 < Y > YANG 3:3 4:5 7:21 16:11, 24 18:11 19:8 20:8 21:2, 14 22:9
---	--	--	--

28:22	29:9	55:11, 15	
30:14	33:2	57:2, 10	
43:19	44:5	59:22	60:3,
45:14	48:2	12, 20	61:13,
50:11, 21		16, 18, 19, 25	
51:5, 11, 25		62:16, 23	
55:24	56:10	63:5, 14, 15	
57:1, 9	59:2,	69:13	70:16,
8	61:1	17	71:2
63:23	66:4,	75:23	76:3,
16	68:18, 25	19	78:19
73:10	74:21	79:17	80:19,
78:10, 24		22, 24	81:10
80:7	81:9	82:11, 16	
82:10	96:16,	84:15, 18	
20	97:10, 22	86:12	87:1,
100:10	101:4,	3, 4, 6	91:1,
8, 23	102:9,	5, 8	94:6, 9
17	103:6, 16	95:15, 19, 23	
104:4, 19		96:13	97:16
105:16, 21		98:10	99:2
107:8		100:1	103:5,
Yeah	5:13	7, 17	106:2, 4
7:6, 24	9:6,	year	31:16
9, 13, 15, 25		90:12	
10:23	12:3	years	31:14
16:12	18:12	33:17	90:22
19:23	20:2,	Yep	48:18, 23
9	21:3, 8, 24	53:6	56:7
23:6, 25		60:8, 11, 12	
26:14	27:10,	63:1	87:17
15	28:6, 9,	99:24	
21, 23	30:15,	yes's	11:2
24	31:20	YouTube	35:20,
32:6	33:25	23	
34:4, 5	36:4,		
18	37:24	< Z >	
39:14, 18		zero	105:10,
40:12	41:2,	11	
7, 11, 16, 18		Zoom	9:7
42:11, 15		10:5	13:4
43:9, 21		39:10, 16	
44:6, 16, 24		41:5	42:9
46:6	47:4, 6,	48:22	61:15
13	50:12	zoomed	41:6
51:11	52:15,		
22	53:3, 16		