

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

-----X
MAXELL, LTD., :
 :
Plaintiff, :
 : Case No.:
 :
v. :
 : 5:23-cv-00092-RWS
SAMSUNG ELECTRONICS CO., LTD. :
AND SAMSUNG ELECTRONIC AMERICA, :
INC., :
Defendants. :
-----X

Deposition of BENJAMIN BEDERSON, PH.D.

Conducted Remotely

Thursday, June 6, 2024

10:01 a.m.

Reported by: Matthew Goldstein, RMR, CRR

DIGITAL EVIDENCE GROUP
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Washington, D.C. 20036
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1 Deposition of BENJAMIN BEDERSON, PH.D.,
2 conducted remotely:

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9 Pursuant to Notice, before Matthew Goldstein,
10 RMR, CRR, Notary Public in and for the State of
11 Maryland.

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1 A P P E A R A N C E S

2 ON BEHALF OF THE PLAINTIFF, MAXELL, LTD.:

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8

9 ON BEHALF OF THE DEFENDANTS, SAMSUNG

10 ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONIC

11 AMERICA, INC.:

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1 P R O C E E D I N G S

2 Whereupon,

3 BENJAMIN BEDERSON, PH.D.,

4 being first duly sworn or affirmed to testify to the

5 truth, the whole truth, and nothing but the truth,

6 was examined and testified as follows:

7 EXAMINATION BY COUNSEL FOR THE PLAINTIFF

8 BY MR. JAVED:

9 Q. Good morning, Dr. Bederson.

10 A. Good morning.

11 MR. SUNG: Counsel, one thing I'd like
12 to note on the record briefly is that, as you
13 notice, I'm in the same room with Dr. Bederson.
14 So please let me know if you have any issues with
15 conversating. If so, I can find a separate room.

16 MR. JAVED: Sure. Thank you.

17 BY MR. JAVED:

18 Q. Dr. Bederson, would you please begin by
19 stating your full name for the record?

20 A. It's Benjamin B. Bederson.

21 Q. And what is your current work address?

22 A. I work out of my home in Windsor,

1 Massachusetts.

2 Q. And, Dr. Bederson, have you ever been
3 deposed before?

4 A. Yes, I have.

5 Q. How many times total have you been
6 deposed before today?

7 A. I don't have an exact count, but I
8 believe it's somewhere around 50 or 60 times over
9 the last 15 years.

10 Q. And when was the last time you were
11 deposed?

12 A. Last week.

13 Q. Was it in person or remote?

14 A. Like this, I was in person with the
15 counsel I was working with, and the party taking
16 my deposition was remote.

17 Q. So since you're likely familiar with the
18 process, I'll try to dispense with some of these
19 questions quickly.

20 And as you know, please provide verbal
21 responses. Okay?

22 A. Yes.

1 Q. If you don't understand a question I'm
2 asking, please ask me for clarification.

3 A. Okay.

4 Q. If you don't ask for clarification on a
5 question, can we agree that you understood that
6 particular question?

7 A. I mean, I'll do my best to ask any
8 clarifying questions to help me try and understand
9 what it is that you're asking.

10 Q. Sure.

11 We'll be taking breaks approximately
12 every hour, but if you need a break before then,
13 please let me know and we can take a break. Okay?

14 A. Yes, that's fine. Thank you.

15 Q. Dr. Bederson, you understand that you
16 are under oath to testify truthfully today;
17 correct?

18 A. Yes, that's right.

19 Q. And is there any reason why you can't
20 testify truthfully and accurately today?

21 A. No.

22 Q. Dr. Bederson, what did you do to prepare

1 for today's deposition?

2 A. I read documents and talked with
3 counsel.

4 Q. And approximately how long did you
5 prepare for this deposition?

6 A. I don't have an exact count, but
7 somewhere in the order of two days.

8 Q. And you mentioned that you met the
9 counsel to prepare for this deposition. Could you
10 provide the name of that counsel?

11 A. Yes, I met with two counsel. One was
12 Sangwon Sung, and the other was Jim Hines.

13 Q. And when did you first hear about this
14 lawsuit?

15 A. I don't have a specific recollection.

16 Q. Who first contacted you on behalf of
17 Samsung regarding this lawsuit?

18 MR. SUNG: Objection. Objection on the
19 basis of privilege.

20 I just would like to caution the
21 witness, please do not disclose the content of the
22 communication with counsel. Thank you.

1 THE WITNESS: I'm sorry, I'm not sure
2 how to answer your question without disclosing the
3 content of communication with counsel.

4 BY MR. JAVED:

5 Q. I'm just asking the name of the person
6 who -- like who contacted you on behalf of Samsung
7 regarding this lawsuit?

8 A. I don't remember specifically who it
9 was.

10 Q. And when did you first start working on
11 this case?

12 A. I don't have a specific recollection of
13 when it was.

14 Q. Dr. Bederson, how many times have you
15 been retained as an expert for litigation?

16 A. In your question, are you distinguishing
17 litigation from patent office proceedings, or are
18 you including patent office proceedings in that
19 question?

20 Q. Including the patent office proceedings,
21 also.

22 A. So I don't have an exact count, but what

1 I can tell you is I know the first time I did this
2 was in 2009. So I guess that's about 15 years. I
3 know, as I mentioned, I've had my deposition taken
4 50 or 60 times.

5 So I don't know exactly, but what I
6 could tell you is it's more than that 50 or 60
7 times, because not every proceeding results in
8 deposition. So something more than 50 or 60, but
9 I don't have a specific count.

10 Q. Let's get your CV out.

11 MR. JAVED: I'm going to mark Exhibit 1,
12 the Bederson CV, and Exhibit 2, the Bederson claim
13 construction declaration.

14 (Bederson Deposition Exhibit 1 was
15 marked for identification and attached to the
16 transcript.)

17 (Bederson Deposition Exhibit 2 was
18 marked for identification and attached to the
19 transcript.)

20 BY MR. JAVED:

21 Q. Dr. Bederson, I'm going to drop these
22 exhibits in the chat. Please let me know when you

1 have downloaded and opened them.

2 Can you open Exhibit 1?

3 A. Yes, I'm opening it now.

4 I also should tell you I did bring with
5 me clean, unmarked copies of a few of the
6 documents in this matter. So if it's okay with
7 you, I might sometimes refer to the electronic
8 copies you provide, as well as the paper copies
9 that I brought with me.

10 Q. That's completely fine. Thank you.

11 A. All right. I have Exhibit 1 in front of
12 me.

13 Q. Okay. Dr. Bederson, is this your CV?

14 A. Yes, this is my academic CV.

15 Q. And can you just go through this
16 document and make sure it's a complete and
17 accurate copy of your CV?

18 A. Yes, it does appear to be a complete
19 copy and accurate, as well, as of the date,
20 March 16th, 2024.

21 Q. Would you please open Exhibit 2?

22 A. Okay.

1 Q. Dr. Bederson, is this the declaration
2 you submitted for '815 patent?

3 A. Yes, it is a declaration I submitted on
4 May 30th, 2024.

5 Q. And is that your signature on the front
6 page of this declaration?

7 A. Yes, it is.

8 Q. When did you start work on your claim
9 construction declaration?

10 A. I don't have a specific recollection of
11 when I started work on it.

12 Q. Approximately how many hours did you
13 spend working on your claim construction
14 declaration?

15 A. I'm not sure. I didn't count in my head
16 how many hours it was.

17 Q. And did you write every word of it?

18 A. The declaration is my declaration, and
19 it represents my opinions, which I stand by. I
20 wrote it in collaboration with counsel.

21 Q. And is there any part of your report or
22 declaration which you believe is inaccurate or

1 needs corrections?

2 A. I'm not aware of any parts of my
3 declaration that are inaccurate, but I did notice
4 two typographical errors that I think are worth
5 correcting to avoid a possible misunderstanding.

6 The first is in paragraph 35, starting
7 at the -- around the fifth line down of 35, it's
8 written, "Not only is there no implied disclosure
9 of receiving unencrypted video information," and
10 it goes on from there.

11 That word "unencrypted" should actually
12 read "encrypted." So it should read, "Not only is
13 there no implied disclosure of receiving encrypted
14 video information." So that was a typographical
15 error, and I apologize.

16 And then there's one other one I would
17 like to correct. So for context, if you look at
18 paragraph 52. The second sentence says, "A
19 'character' in the index of UI design and computer
20 science is fundamentally different from an
21 arbitrary image such as an image of a cartoon
22 character."

1 That helps to clarify the correction I'm
2 about to make in the next paragraph, paragraph 53.

3 In the second-to-last sentence, it says, "On the
4 other hand, arbitrary images such as a character
5 like Batman," and that should say, "as a cartoon
6 character like Batman."

7 So, again, I apologize for those
8 mistakes.

9 Q. Okay. Thank you.

10 Dr. Bederson, I want to turn to
11 Exhibit 1, your CV. Do you have it in front of
12 you?

13 A. Yes.

14 Q. You received your Ph.D. in 1992;
15 correct?

16 A. That's right.

17 Q. What subject did you receive your Ph.D.
18 in?

19 A. My Ph.D. was awarded by the computer
20 science department, and it included -- my research
21 work for my Ph.D. included a range of
22 information -- a range of subjects in computer

1 science, but relating to computer vision,
2 robotics, video formats and transmission, and
3 encodings, among other things.

4 Q. And what is your current employment?

5 A. So on the first page of my CV, I list
6 four organizations as an employment because those
7 are all organizations that I'm involved with.
8 They're not -- I don't receive income from all
9 those, but those are all organizations I'm
10 involved with.

11 Those are the J.S. Bryant School,
12 Bederson Expert Services, the University of
13 Maryland, and the International Children's Digital
14 Library Foundation.

15 I also list elsewhere in my CV a number
16 of organizations that I do consulting with and I
17 additionally receive income from.

18 Q. And looking at your CV, you've been a
19 professor at the University of Maryland since
20 1998; correct?

21 A. That's right.

22 Q. Which courses do you teach at University

1 of Maryland?

2 A. As I list in my CV in 2019, in
3 July 2019, I became professor emeritus. I
4 actually officially retired from the University of
5 Maryland. I retained that title and have a
6 strong, positive ongoing connection with the
7 University of Maryland, but I'm not currently
8 teaching any courses.

9 Q. And what courses did you teach before
10 you received this emeritus status?

11 A. So I listed many of the courses I taught
12 in my CV on pages 34 and 35 and 36. And they
13 covered a wide range of areas and largely in
14 computer science from programming to design to
15 research, to visualization in areas of
16 human-computer interaction and user interfaces,
17 computer graphics, software engineering, among
18 other things.

19 Q. Dr. Bederson, could you explain what is
20 a human-computer interaction?

21 A. I address that question in part in my
22 declaration in paragraphs 7 and 8. So in

1 paragraph 8, I say, in part, that "Researchers in
2 this field," that is the field of human-computer
3 interaction, "are focused on making universally
4 usable, useful, efficient, and appealing systems
5 to support people in their wide range of
6 activities."

7 I go on to say that, "My approach is to
8 balance the development of innovative technology
9 that serves people's practical needs."

10 And in the previous paragraph, I explain
11 that my experience over 30 years of teaching and
12 research includes interests in human-computer
13 interaction and the software and technology
14 underlying today's interactive computing systems.
15 This includes the design and implementation of
16 software applications on mobile devices, including
17 smart phones and PDAs, such as my work on
18 DateLens, LaunchTile, and StoryKit described
19 below.

20 Q. So going back to Exhibit 2, which is
21 your declaration, in paragraph 8, which you just
22 mentioned, the fifth line you have mentioned that

1 you have built a software, which is called
2 PadPrints.

3 Could you explain what that is?

4 A. Sure. So PadPrints is something, as I
5 mentioned, that I was working on in the 1998 time
6 frame. I published at least two papers about it
7 that are listed in my CV, one on page 7, Item 37,
8 called Graphical Multiscale -- I'm sorry,
9 Graphical Multiscale Web Histories: A Study of
10 PadPrints. And then on page 11, Item 53 is titled
11 PadPrints: Graphical Multiscale Web Histories.

12 Generally, both of them provide a
13 history of a person's browsing of the web in a web
14 browser by monitoring which pages they browse and
15 taking screenshots of those pages as they browse
16 them and then building a visual map of those
17 pages.

18 That map is displayed in a separate
19 window to the side of the browser, and that map is
20 displayed in a multiscale or zoomable environment,
21 which had -- that zoomable environment had been a
22 focus of my research for several years at that

1 point. And it enabled the user to see which pages
2 they had visited in which context, and then use
3 that map to drive the browser to revisit any of
4 those pages on the map.

5 So that's at least a partial description
6 of what PadPrints did.

7 Q. And did you write the software code for
8 this application yourself?

9 A. I think I wrote it partly myself and
10 partly in collaboration with a grad student.

11 Q. And in paragraph 10 of your declaration,
12 you mention Zumobi, the creation of Zumobi in
13 2006.

14 Could you explain what that is?

15 A. Sure. So I had mentioned zoomable user
16 interfaces -- sorry, zoomable user interfaces that
17 I had been working on for a few years by 1998. I
18 think I actually started them in around 1992 or
19 1993. And I had continued working on them for
20 many years.

21 Generally, zoomable user interfaces were
22 a way to display a large amount of graphical

1 information in a flat two-dimensional space but at
2 different scales, so that you could have both
3 information at different scales, as well as
4 zooming in and out to access -- zoom in and access
5 details of the information or zoom out to get an
6 overview of documents and information.

7 Starting in around 2001, I applied those
8 techniques to mobile devices and started
9 collaborating with Microsoft. And I built a
10 number of mobile applications using this zoomable
11 user interface design approach on mobile devices,
12 including the Microsoft pocket PC platform.

13 And then in around 2006, some colleagues
14 or collaborators of mine at Microsoft research and
15 I decided to create a start-up company to
16 commercialize some of the ideas that I had
17 developed in that time frame, as I said, in part
18 in collaboration with Microsoft. So that company
19 became Zumobi, which stands for zoomable
20 interfaces on mobile devices.

21 And I worked with them in different
22 capacities for about almost eight or ten years.

1 It started off developing specifically user
2 interfaces based on that mobile design approach
3 and then shifted to becoming more focused on
4 mobile advertising, sometimes continuing to
5 include the zoomable interfaces in the products
6 that it made and shipped.

7 Q. Dr. Bederson, in paragraph 11, you have
8 mentioned that you have published almost 140
9 technical publications.

10 Do any of these publications involve HCI
11 or user interfaces technologies?

12 A. Yes, many of them. I'll add that later
13 on in that paragraph I described a number of
14 awards that I won from the ACM's Special Interest
15 Group on computer-human interaction. And that
16 ACM, that parent -- well, I would say the
17 computer-human interaction group called SIGCHI is
18 really the premier international professional
19 community of researchers and practitioners and
20 educators in the field of HCI. And that is a
21 group within ACM, which is the premier
22 international organization of professional

1 computer scientists.

2 And the awards that I won, including the
3 Social Impact Award in 2010, being recognized as
4 an ACM distinguished scientist, as well as being a
5 member of the CHI Academy, are all based on my
6 publications and work in the field of HCI.

7 Q. And in paragraph 12, you mentioned that
8 you have appeared on a number of radio shows to
9 discuss issues relating to user interferences and
10 design.

11 Were these scientific radio shows?
12 Could you explain what sort of radio shows were
13 they?

14 A. So I list many of those radio shows on
15 my CV. Many of the appearances were on WAMU Kojo
16 Nnamdi's Show. And I think I listed each of
17 those. And so it looks like there's maybe 20 or
18 so of them between -- well, over a period of
19 years.

20 So that was a -- the Kojo Nnamdi Show
21 was a -- I guess I'd call it a regional, but also
22 syndicated, public interest show. And once a week

1 they had an hour focusing on technical issues.
2 And so most of my appearances were in that hour
3 segment that was focusing on technical issues.

4 I was -- have also been on the radio for
5 other radio stations. They're probably listed on
6 my CV, but I don't remember what the names of
7 those stations were. So I could look for them,
8 but I don't recall off the top of my head what --
9 which they were.

10 Q. And then in the same paragraph,
11 paragraph 12, second sentence you state that your
12 work has been discussed and have been quoted by
13 mainstream media around the world over 120 times.

14 Will you explain that statement?

15 A. That's a summary of -- as I said,
16 numerous times my work has been included in
17 mainstream media. I listed most of those in my CV
18 on pages 24 through pages 34. And I included the
19 date, the name of the media that included the
20 publication, and the title of the article or show
21 that I was mentioning, and URLs when they were
22 available.

1 Q. And in paragraph 14, you have mentioned
2 that you're a coinventor of 14 U.S. patents and 20
3 U.S. patent applications. And then you
4 specifically point to U.S. Patent No. 7,707,503,
5 issued in 2010.

6 Could you give me a brief overview of
7 that patent?

8 MR. SUNG: Objection; form.

9 THE WITNESS: As I mentioned in my
10 declaration, that patent, which was issued in
11 2010, has the title, "Methods and systems for
12 supporting presentation tools using zoomable user
13 interfaces."

14 And my recollection is that it builds on
15 this concept of zoomable user interfaces that I
16 had mentioned earlier. But without having that
17 patent in front of me, I don't think I can recall
18 enough details about it to give you additional
19 information.

20 BY MR. JAVED:

21 Q. Dr. Bederson, now moving to Section 2 of
22 your report, "Legal Standards."

1 And your legal standards section is
2 paragraph 15 to 25; correct?

3 A. That's right.

4 Q. And did your counsel inform you of the
5 legal standards that you applied in your claim
6 construction declaration?

7 MR. SUNG: Objection on the basis of
8 privilege. I caution the witness just to answer
9 yes or no.

10 THE WITNESS: Yes.

11 BY MR. JAVED:

12 Q. Have you ever submitted a claim
13 construction declaration in the past?

14 A. Yes, I have.

15 Q. Approximately how many times?

16 A. I'm not really sure. Probably just a
17 few, but I really don't know how many.

18 Q. Let's go to page 7 of your declaration,
19 where you have provided your opinions on the first
20 term, "receiving...the video
21 information...including second information that is
22 encrypted [sic]."

1 A. Okay. I'm there.

2 Q. Now, let's look at paragraph 27. You
3 have stated that, quote, These are simple words,
4 end quote.

5 Which word are you referring to here?

6 Which are simple words?

7 MR. SUNG: Object to form.

8 THE WITNESS: I was referring to the
9 words in the term that I'm stating my opinion
10 about, which I described in the -- which I cited
11 in the previous paragraph.

12 BY MR. JAVED:

13 Q. Dr. Bederson, what is plaintiff's
14 proposed construction for this term?

15 A. I believe it is plain and ordinary
16 meaning, as I listed in the table at the beginning
17 of this section.

18 Q. And I'm going back to paragraph 27, on
19 page 8, the next page.

20 You have stated that, Plaintiff's
21 attempt to twist the plain and ordinary meaning
22 of, quotes start, second video information that is

1 encrypted, quotes end, to include second video
2 information will be unencrypted later must be
3 rejected as contrary to this plain meaning.

4 Dr. Bederson, where are you getting this
5 construction regarding plaintiff's term --
6 regarding this term?

7 MR. SUNG: Objection; form.

8 THE WITNESS: Well, first of all, it
9 looks like there's a typo here similar to the
10 other typo I mentioned, so I apologize. So when
11 it says, "to include second video information will
12 be unencrypted later," I believe that should read,
13 "to include second video information that will be
14 encrypted later."

15 That said, I believe this understanding
16 comes to me from counsel.

17 BY MR. JAVED:

18 Q. Dr. Bederson, do you understand that a
19 patentee can act as his or her own lexicographer
20 in defining a term?

21 A. I do. That information was provided to
22 me by counsel that I describe in paragraph 20,

1 where I say, "I also understand from Defendants'
2 counsel that two instances where a claim term is
3 given a different meaning than it otherwise would
4 have are: (1) when a patentee sets out a
5 definition and acts as his own lexicographer..."

6 Q. So is it your position that Samsung's
7 proposed construction is based on lexicographic?

8 A. As I said, my -- so no, I don't have an
9 opinion related to the patentee acting as their
10 own lexicographer. As I've explained in my
11 declaration, I believe these -- the words in this
12 claim term are simple, and their meaning comes
13 from -- a POSITA would understand their meaning
14 from their plain and ordinary meaning, and I've
15 explained what I believe that meaning is.

16 Q. Dr. Bederson, have you reviewed the
17 prosecution history of the '815 patent?

18 A. Yes, I have.

19 Q. Is it your position that Samsung's
20 proposed construction is based on disclaimer or
21 disavowal provided in the prosecution history of
22 the '815 patent?

1 A. I refer to some of the relevant parts of
2 the prosecution history in paragraph 33 of my
3 declaration, where I referred to a declaration
4 that I filed relating to the same patent in
5 IPR2024-00777, in which I demonstrated that
6 Claims 16 through 27 of the '815 patent are not
7 entitled to priority to certain previously-filed
8 applications because none of those prior
9 applications includes a written description of
10 receiving second video information in encrypted
11 form.

12 Q. But my question is: Is it your position
13 that Samsung's proposed construction is based on a
14 disclaimer provided in the prosecution history of
15 '815 patent?

16 A. Beyond this paragraph, I don't think I
17 have any further opinions about the prosecution
18 history regarding this term.

19 Q. Dr. Bederson, looking at paragraph 32,
20 second sentence of this paragraph, where you say,
21 "In other words, it is my understanding that
22 Plaintiff contends that 'second video information

1 that is encrypted' can include 'second information
2 that is not encrypted.'"

3 Where did you get that information
4 regarding plaintiff's position?

5 A. As I said earlier, and as I also explain
6 in the first sentence of paragraph 32, "it is my
7 understanding from counsel for Defendants that
8 Plaintiff argues for a broader scope that includes
9 not just the receipt of second video information
10 that is encrypted -- that is in encrypted form
11 when it is received, but also includes the receipt
12 of information that is unencrypted when it is
13 received and encrypted only later."

14 Q. But, Dr. Bederson, looking at
15 plaintiff's construction for this term which you
16 have put in the table above paragraph 26,
17 plaintiff's position is that this term should be
18 construed according to plain and ordinary meaning.

19 So where exactly is the second
20 construction which you're pointing to here is
21 coming from?

22 A. I believe I just answered that, which is

1 that understanding was provided to me by counsel
2 for defendants.

3 Q. Now, looking at paragraph 34, second
4 sentence, you state that, "This is because, while
5 it is true that encryption is typically performed
6 prior to transmission."

7 Could you explain what you mean by
8 "typically" here?

9 A. I explain this in paragraph 31, where I
10 say that, "a person of skill in the art would
11 understand that encryption is a process typically
12 (but, as discussed below, not always) applied to
13 data before transmission to a receiving device in
14 order to protect the data during transit."

15 So a key reason that this occurs, and I
16 describe it as "typically," is, as I said, to
17 protect data during transit. And in practice, it
18 is common and, thus, typical to encrypt paid
19 television content or content that's not free
20 to -- in order to control access.

21 Q. And this includes digital broadcast
22 data?

1 A. I couldn't hear you clearly. Could you
2 repeat your question, please?

3 Q. I'm saying like the data you mentioned
4 which typically should be encrypted, does that
5 include the broadcast -- digital broadcast data,
6 also?

7 A. Yes, it does.

8 Q. Going back to paragraph 34, the third
9 sentence you point to "lack of written
10 description."

11 So is Samsung -- in your opinion, is
12 Samsung providing a construction that is not
13 supported by written description of the '815
14 patent specification?

15 A. I did not form a specific opinion in
16 this declaration about whether the '815 patent
17 provides written description for this term. In
18 this section of my report, I was referring to my
19 analysis from IPR2024-00777, where I provided an
20 analysis about written description in prior
21 applications.

22 Q. So in your opinion, the '815 patent

1 specification provides written description for
2 this term?

3 A. That's not what I said. What I said was
4 that I didn't form an opinion in this declaration
5 about whether the '815 patent itself provides
6 written description support for this term.

7 Q. Looking at paragraph 36, the last
8 sentence, there you're quoting from the Satellite
9 Times publication, and you state that, "This gives
10 us potentially 600 channels of programming, about
11 half of which are unencrypted and in the clear."

12 Is it your opinion that the other half
13 is encrypted?

14 MR. SUNG: Objection; form.

15 THE WITNESS: Just to clarify, this
16 sentence that you're reading is on the bottom of
17 page 11, which is part of paragraph 36. But
18 paragraph 36 continues through most of page 12.

19 My opinion here is that this disclosure
20 provides evidence of unencrypted satellite
21 broadcasts, which it explains quite clearly when
22 it says, of the potentially 600 channels of

1 programming, about half of which are unencrypted
2 and in the clear. I didn't form an opinion about
3 the other half.

4 I'll note we've been going for about an
5 hour. So when it's a good time to take a break,
6 I'd like to take one.

7 MR. JAVED: Sure. I think it's a -- we
8 can take a break right now.

9 (Recess from the record.)

10 MR. JAVED: Now I'm going to mark
11 Exhibit 3, Bederson IPR declaration.

12 (Bederson Deposition Exhibit 3 was
13 marked for identification and attached to the
14 transcript.)

15 BY MR. JAVED:

16 Q. Dr. Bederson, I just shared that exhibit
17 with you to the chat. Please let me know once you
18 have downloaded it and opened it.

19 A. Okay.

20 Q. Dr. Bederson, do you recognize this
21 document?

22 A. Yes, I do.

1 Q. Is this the declaration you provided for
2 the IPR2024-00777?

3 A. Yes, it is. I believe this declaration
4 was also used for IPR2024-00735.

5 Q. Let's go to page 40 of this declaration.

6 A. Okay.

7 Q. Do the paragraphs 73 to 80 include all
8 the terms that you construed for the purpose of
9 providing your opinions in this IPR declaration?

10 A. Would you mind repeating your question,
11 please?

12 Q. Sure.

13 Do the paragraphs 73 to 80 include all
14 the terms that you construed for the purposes of
15 providing your opinions in this IPR declaration?

16 A. Well, my full opinion is in that
17 declaration and I may have other portions where I
18 provided additional explanation of my
19 understanding. But paragraph 73 through 80 are
20 the paragraphs where I explained my analysis of
21 the terms that I said require a construction in
22 this declaration.

1 Q. Dr. Bederson, did you construe the term,
2 which we were just discussing from your Exhibit 2,
3 your declaration, which the term is,
4 "receiving...the [sic] first video
5 information...including second information that is
6 encrypted"?

7 Did you construe that term in this IPR
8 declaration?

9 A. No, I don't believe I did.

10 Q. Now, let's look at paragraph 72 on this
11 IPR declaration.

12 You have stated that, "I have construed
13 any claim term not listed below according to its
14 plain and ordinary meaning to a POSITA at the time
15 of the '815 patent's earliest claimed priority
16 date."

17 Is that still your opinion?

18 A. That is my opinion regarding that IPR
19 declaration.

20 Q. So, basically, you're saying that for
21 the IPR declaration, the term "receiving...first
22 video information...including second information

1 that is encrypted" should be construed according
2 to its plain and ordinary meaning; correct?

3 A. So I addressed in my IPR declaration
4 this term involving "second video information that
5 is encrypted" in multiple parts of my declaration.
6 But, for example, I addressed it directly when I
7 addressed claim limitation 16A in paragraphs 280
8 through 285.

9 And in this section, I applied the plain
10 and ordinary meaning as I have understood it in my
11 current claim construction declaration by showing
12 prior art that teaches the understanding that I
13 explained. So I did not need to go any further
14 than that for the purposes of that IPR
15 declaration.

16 And I further explained multiple places
17 in my claim construction declaration that there is
18 nothing in my IPR declaration that contradicts or
19 is inconsistent with my claim construction
20 declaration.

21 Q. But you did not construe the term
22 "receiving...first video information...including

1 second video information that is encrypted" in
2 your IPR declaration; correct?

3 A. That's right, because I didn't need to
4 for the purposes of that declaration.

5 Q. And then based on your paragraph 72
6 statement, you have said that any term which is
7 not listed below according to its plain and
8 ordinary meaning to a POSITA at the time of -- at
9 the time of the '815 patent's earliest claimed
10 priority date -- sorry, strike that. Let me just
11 read the whole sentence.

12 You have said that, "I have construed
13 any claim term not listed below according to its
14 plain and ordinary meaning to a POSITA..."

15 That is also correct?

16 A. That's right. And that's also
17 consistent with my claim construction declaration,
18 where I'm also construing it according to the
19 plain and ordinary meaning, which I have further
20 explained and, as I've just said, my IPR
21 declaration is consistent with.

22 Q. Would you again point me to that

1 paragraph that you said where you construed this
2 term in the IPR declaration?

3 A. Maybe you misunderstood me. I didn't
4 say I construed this term. I said I applied its
5 plain and ordinary meaning, and I explained where
6 I applied it. And that is consistent with my
7 claim construction declaration where I construed
8 this term as plain and ordinary meaning, where I
9 provided an explanation of what that plain and
10 ordinary meaning is.

11 Q. Dr. Bederson, let's go back to your
12 claim construction declaration, page 16.

13 Here you have provided your opinions
14 regarding the second term, which is "character."

15 Do you see that?

16 A. I do.

17 Q. Would you state Samsung's construction
18 for this term?

19 A. I provided my opinion that the
20 construction for the term "character" should be a
21 letter, number, punctuation mark, or other symbol
22 or control code that is represented to a computer

1 by one unit of information.

2 Q. Dr. Bederson, what do you mean by
3 "control code" here?

4 A. In paragraph 54 of my declaration, I
5 cite to a number of dictionary definitions that
6 define the word "character," including control
7 code.

8 And in paragraph 59, I describe that
9 plaintiff cites to additional dictionary
10 definitions, which, as I explain, are largely
11 consistent with the definitions that I found in
12 dictionaries.

13 And in plaintiff's dictionary
14 definition, it provides some examples of
15 characters, such as the letter A being ASCII
16 code 65 and the carriage return being ASCII
17 code 13.

18 So I think a person of skill in the art
19 would probably consider a carriage return with
20 ASCII code 13 to be an example of a control code,
21 which would be a character that would impact the
22 display but might itself not appear on this

1 display beyond impacting other characters on the
2 display.

3 Q. So just to understand this, you are
4 saying -- and I'm going back to your paragraph 59,
5 where you have said, ASCII code such as the
6 letter A is ASCII code 65, a carriage return is
7 ASCII code 13.

8 So you're saying this carriage return is
9 the control code?

10 A. Well, this section is citing a
11 dictionary definition from the plaintiff for
12 "character." And as I explained, I also provided
13 dictionary definitions that described "character,"
14 including listing control codes as examples of
15 "character." And I was pointing to carriage
16 return ASCII code 13 as an example a character
17 that a person of skill in the art might consider
18 to be a control code.

19 Q. I still don't understand what exactly is
20 a control code. I get what letter, number,
21 punctuation mark, or other symbol is.

22 But how do you see a control code on a

1 computer screen?

2 A. Well, as I said, the carriage return
3 would typically impact how other characters are
4 displayed on a computer screen.

5 Q. So you're saying control code is not --

6 A. Sorry, I have something else to say.

7 Additionally, sometimes carriage returns
8 are themselves rendered on the screen with a mark
9 representing the carriage return itself. So I
10 think control codes can be used in different ways.

11 Q. So, basically, you're saying that
12 control code is not something that is visually
13 available to a POSITA, but it's something which is
14 happening at the back end through computer
15 rendering?

16 MR. SUNG: Objection; form.

17 THE WITNESS: No, I don't think that's
18 what I said. What I said is that there's a range
19 of control codes. They can work in different
20 ways. I pointed to carriage return as an example
21 of something that a person of skill in the art
22 would probably consider to be a control code.

1 And the carriage return itself can work
2 in different ways. One way it can work is to
3 impact the display of other characters. In
4 addition, the carriage return can be displayed
5 directly itself through some visible elements on
6 the screen.

7 BY MR. JAVED:

8 Q. Would you explain what "carriage return"
9 means? Maybe I'm not understanding what carriage
10 return in ASCII is.

11 Could you explain that concept?

12 A. Sure. So carriage return is a character
13 in the ASCII code, and it is typically used to
14 impact the display of other characters by
15 typically moving the characters that appear after
16 the carriage return onto a new line.

17 Much as you might experience if you're
18 using a word processor and you press the "enter"
19 or "return" key, that would often result in a
20 character such as a carriage return being entered
21 into the document which could be -- impact the
22 display of other characters on the screen.

1 But as I said, it is also well known to
2 a POSITA that characters such as a carriage return
3 themselves can be rendered with a visible symbol
4 that shows that there is a carriage return on the
5 screen. Sometimes I've seen it rendered as a
6 little bent arrow to sort of indicate that there's
7 some impact on following text.

8 Q. And does the '815 patent disclose
9 anywhere the word "control code"?

10 A. I don't remember it doing so. But as I
11 said, "control code" was used in multiple
12 dictionary definitions, as well as the concept of
13 a control code being in the dictionary definition
14 that the plaintiff cited.

15 Q. Dr. Bederson, going back to the
16 construction for this term, the later part of that
17 construction says that the control code is
18 represented to a computer by one unit of
19 information.

20 Can you explain to me what you mean by
21 "one unit of information"?

22 A. Sure. So I think in every definition

1 that I described in my declaration, including the
2 definitions that I provided, as well as the
3 definition that plaintiff provided, there is a
4 description of the concept of a character being
5 stored in one unit of information.

6 So, for example, in paragraph 54, the
7 first definition I provided from Microsoft
8 Computer Dictionary, 5th Edition from 2002, says,
9 quote, A letter, number, punctuation mark, or
10 other symbol or control code that is represented
11 to a computer by one unit - 1 byte - of
12 information.

13 So when a person of skill in the art
14 reads this definition, they would understand this
15 definition to describe the characters being
16 represented by one unit of information, where
17 1 byte is an example of one unit of information.

18 The other definitions, I believe,
19 describe storing a character in 1 byte of
20 information, and a person of skill in the art
21 would understand that in this time frame that
22 while ASCII was very common and stored characters

1 in 1 byte of information, there were other
2 standard and common character representations,
3 such as Unicode, which I describe elsewhere in my
4 declaration. And Unicode also stored characters
5 in one unit of information, which sometimes -- in
6 this time frame was typically stored in 2 bytes of
7 information.

8 Q. So just to clear my understanding, you
9 are saying one unit of information can be 1 byte,
10 2 byte, or more?

11 A. I think in this time frame it was
12 typically 1 byte or 2 bytes. I don't recall
13 whether Unicode at this point supported more than
14 2 bytes of information.

15 MR. JAVED: Now I want to mark
16 Exhibit 4, UTF-8 Character Chart.

17 (Bederson Deposition Exhibit 4 was
18 marked for identification and attached to the
19 transcript.)

20 BY MR. JAVED:

21 Q. Dr. Bederson, I just added it to the
22 chat. Please let me know once you have downloaded

1 and opened it.

2 A. Okay.

3 Q. So looking at Exhibit 4, which is UTF-8
4 4-Byte Character Chart, if you look at the first
5 bullet point, it says that, "This chart shows
6 selected groups of 4-byte characters, including
7 emojis, symbols, and Egyptian hieroglyphs."

8 And then, you know, continuing with your
9 previous statements that one unit of information
10 can be 1 byte, 2 byte, could we say that it can be
11 4 bytes also, one unit of information, based on
12 the UTF chart which I just showed you?

13 A. So I don't believe I've seen this
14 particular document before. So sitting here
15 today, I do notice that it is dated 2019, which is
16 well over a decade after, I believe, the time of
17 the patent. And as I said, I wasn't sure which
18 byte formats UTF or Unicode supported in the time
19 frame of the patent.

20 And as I said, my opinion is that a
21 character is represented to a computer by one unit
22 of information. As I said, at the time of the

1 patent, it certainly would include at least 1 byte
2 of information per characters or 2 bytes of
3 information per characters.

4 It is possible that it included more,
5 but that is still fundamentally distinguished from
6 things that are not characters, which I explained
7 in my declaration, such as arbitrary images or
8 thumbnails, which are typically represented by
9 various and numerous bytes for their shapes and
10 bytes for their colors and bytes for other visual
11 properties.

12 Really what the one unit of information
13 is getting at is that the character represents not
14 the rendering of the character, but what the
15 character is, such as the letter A. That's some
16 distinction from things that are not characters in
17 the context of this patent, such as thumbnails,
18 which are arbitrary images.

19 Actually, let me add on to that.
20 Looking at the document that you presented to me,
21 I see the second bullet, which aligns with what I
22 just said, where it says, "Not all fonts support

1 all characters. When you see the little box icon
2 with numbers in it, that is a valid character that
3 isn't supported by the font used for this page."

4 And that helps to distinguish the
5 concept of a character and something else, such as
6 a font, where the character is really -- is
7 essentially an index into which character. And
8 the font, similar to a thumbnail, is what actually
9 controls how a character is displayed and what it
10 looks like.

11 Q. So is it your opinion that UTF-8 4-byte
12 was not available at the time of the '815 patent?

13 A. That's not what I said. What I said was
14 I am not sure whether Unicode supported character
15 formats that were more than 2 bytes at the time of
16 the patent. And this document, as I -- at least
17 what it says on the face of the document is that
18 it is from August 17th, 2019.

19 Q. Dr. Bederson, looking at page 8 of this
20 document, it outlines symbols and emojis.

21 In your opinion, are those emojis also a
22 character?

1 A. Well, as I said, I have not seen this
2 document before. So I don't have an opinion about
3 this document. But, generally, characters are
4 effectively indexes to a letter, number,
5 punctuation mark, or other symbol or control code
6 that can be represented to a computer and then
7 displayed.

8 So to the extent an emoji is represented
9 by one of these -- call it an index and it might
10 be rendered by a font, then, yes, I think it's
11 likely that it -- like other symbols would be
12 considered by a POSITA to be a character.
13 Although, I don't think that's a specific opinion
14 that I formed in my declaration.

15 And, also, I should say I'm not sure --
16 I really don't recall when emojis became common
17 and what the state of emojis were at the time of
18 the '815 patent.

19 Q. Dr. Bederson, going back to your claim
20 construction declaration, Exhibit 2. In
21 paragraph 46, you state that, "These 'menu display
22 tags,' also referred to in the '815 patent as

1 simply 'tags,' are graphical images of a file
2 folder with a tab on which appear textual labels
3 such as 'ALL PROGRAM INFORMATION' or 'MOTHER.'"

4 Could you explain to me what you mean by
5 "file folder with a tab on which appear textual
6 labels"? What do you mean by that phrase?

7 A. So as I explained in paragraph 46, the
8 '815 patent refers to "menu display tags." So,
9 for example, in the '815 patent, at Column 6,
10 starting at line 21, describing Figure 6, it says,
11 Reference numeral 601 designates a menu display
12 tag for user No. 1 (who is supposed to be, quote,
13 mother, end quote here).

14 And then if we look at Figure 6 of the
15 '815 patent, we can see reference numeral 601, and
16 it clearly has a line pointing to the thing that
17 601 describes. And it is pointing to the
18 graphical image of the conceptual file folder that
19 a POSITA commonly would describe as a tab.

20 And within that tab, there is the
21 textual label in this case, "mother." But as I
22 said, the patent describes these tabs -- tabs,

1 T-A-B, as menu display tags or tags, T-A-G.

2 And I'll just add that that label, that
3 601 pointing to, is not pointing to the text
4 "mother." It's pointing to the file folder tab,
5 which is actually consistent with all of the
6 figures, but it can be mostly clearly seen in
7 Figure 6 and Figure 7.

8 Q. So just to clear my understanding,
9 you're saying the text "mother," it is inside the
10 tag, the 601 tag?

11 A. What I said was the tag or the menu
12 display tag or the graphical images of the file
13 folder with a tab, T-A-B, and the textual labels
14 such as "mother," appear on that tab, or I guess
15 you could say inside of that tab or tag.

16 Q. Okay. Actually, going back to your
17 construction where the word "one unit of
18 information" was stated.

19 Dr. Bederson, does the '815 patent
20 disclose anywhere the word "one unit of
21 information"?

22 A. I don't recall it doing so. As I

1 mentioned, I got that term "one unit of
2 information" in part from a dictionary definition.

3 Q. Dr. Bederson, do you understand that a
4 patentee can act as his or her own lexicographer
5 in defining a term?

6 A. Yes, I understand that. As I previously
7 explained, I addressed that issue in paragraph 20
8 of my declaration.

9 Q. And is it your position that Samsung's
10 proposed construction is based on lexicography?

11 A. I did not provide an opinion that the
12 construction of character is based on the
13 patentee's -- as the patentee acting as their own
14 lexicographer.

15 Q. And is it your position that Samsung's
16 proposed construction is based on disclaimer, as
17 provided in the prosecution history of the '815
18 patent?

19 A. I did not provide an opinion that the
20 construction of "character" is based on any
21 disclaimer in the prosecution history of the '815
22 patent.

1 Q. Dr. Bederson, let's go back to
2 Exhibit 3, which is your IPR declaration.

3 So in paragraph 73 to 80, you have
4 included the terms that you construed for the
5 purposes of providing an opinion in this IPR
6 declaration; correct?

7 A. That's correct.

8 Q. And did you construe the term
9 "character" here?

10 A. So in my IPR declaration, I addressed
11 the term "character" in part, in response to claim
12 limitation 1F, in paragraphs 151 -- sorry, just in
13 paragraph 151. And in that example, I gave --
14 sorry, in that section, I showed how some prior
15 art taught the use of the required character, such
16 as having the text "Scandinavia" that can be
17 clicked on, including the letter S in
18 "Scandinavia."

19 That is consistent with my construction
20 that I provided in my analysis of the term
21 "character" in my claim construction declaration.
22 And so I did not need to provide a construction of

1 the term "character" in my IPR declaration, and I
2 did not.

3 Q. Dr. Bederson, let's move to the third
4 term, which you have construed on page 24 of your
5 claim construction declaration. The term is "the
6 first group of video information be configured to
7 allow a user to edit."

8 Can you see it?

9 A. Yes, I'm there.

10 Q. Now, looking at paragraph 62, the last
11 sentence where you say, "In context, it seems
12 reasonably certain that the latter is intended,
13 and I have assumed that this is the case for the
14 purpose of my opinion."

15 Could you explain this statement?

16 A. Sure. I explained the statement in the
17 preceding sentences of paragraph 62, where I said
18 that the meaning of the, quote, configure to edit
19 limitation cannot be reasonably determined by a
20 POSITA and is thus -- and is therefore indefinite.

21 I explained that, "this limitation is
22 oddly structured, and grammatically it is not even

1 clear whether the group of video information or
2 the video information is configured to edit
3 something else, or whether the group of video
4 information is itself to be edited."

5 And what I said is -- when I said that
6 "the latter is intended," I was referring to my
7 understanding that the "group of video
8 information" is itself to be edited. And that's
9 how I performed my analysis. Sorry, the term
10 "group of video information."

11 Q. So just to clear my understanding, when
12 you say, "it seems reasonably certain that latter
13 is intended," you mean by looking at this term, a
14 POSITA will understand the "group of video
15 information" is itself to be edited; correct?

16 A. I'm referring to the term -- sorry, the
17 text, "group of video information," that that is
18 the thing being edited rather than the "group of
19 video information" is editing something else.

20 Of course, I then go on to explain my
21 analysis of this partial claim term, "group of
22 video information." But, yes, my opinion is

1 focused on that it is the first group of video
2 information that is being configured to itself be
3 edited.

4 Q. And that's your opinion that a POSITA
5 reading this term would have the same
6 understanding as what you just told me?

7 A. Well, as I said, I think this -- this
8 portion of this limitation is oddly structured and
9 it is grammatically not clear, but I think it's
10 reasonably certain that a POSITA would understand
11 it in the way that I explained.

12 MR. JAVED: Should we take a ten-minute
13 break?

14 THE WITNESS: Let's take a break.

15 MR. JAVED: Thank you.

16 (Recess from the record.)

17 BY MR. JAVED:

18 Q. Dr. Bederson, let's go back to
19 Exhibit 3, your IPR declaration.

20 A. Okay.

21 Q. Page 43, paragraph 78, where you have
22 construed the term "user profile," can you see it?

1 So here in paragraph 78 of your IPR
2 declaration, you have stated that, the first
3 sentence, "In my opinion, these limitations should
4 be construed as requiring data representing
5 distinctive features and characteristics of a
6 user."

7 Do you see it?

8 A. I do.

9 Q. Could you provide me some examples of
10 what you mean by "distinctive features and
11 characteristics of a user"?

12 A. In paragraph 78 of my IPR declaration, I
13 relied on a number of dictionary definitions to
14 try and understand the term "user profile." And
15 in the last definition at the end of that
16 paragraph, the last definition says, "A
17 computer-based record maintained about an
18 authorized user of a multi-user computer system.
19 A user profile is needed for security and other
20 reasons; it can contain information such as the
21 person's access restrictions, mailbox location,
22 type of terminal, and so on."

1 So according to this definition, access
2 restrictions, mailbox location, and type of
3 terminal would be examples of distinctive features
4 and characteristics of a user. But in my claim
5 construction declaration, I explained that without
6 any description in the '815 patent about the term
7 "user profile," a person of skill wouldn't
8 understand what the scope of the term meant in the
9 context of the '815 patent.

10 Q. But looking at both these declarations,
11 in the IPR declaration you have a construction
12 different than what you have provided for your
13 support here in your claim construction
14 declaration.

15 Could you explain why?

16 MR. SUNG: Object to form.

17 THE WITNESS: Well, as I explained in my
18 IPR declaration, I relied on a number of
19 dictionary definitions to try and understand the
20 term. And in my claim construction declaration, I
21 also referred to those dictionary definitions, but
22 I explained that in the '815 patent, there is no

1 written description support for the term "user
2 profile."

3 And really the only thing a person of
4 skill in the art reading the '815 patent would
5 understand is that the term "user profile,"
6 whatever it may be, must be something more and
7 different from both the first character and the
8 identity of the videos associated with the first
9 character.

10 And so without any further description
11 of the term in the '815 patent, despite the
12 dictionary definitions of the term, there's no
13 understanding to a POSITA of what the full scope
14 of the term is and no written description support.

15 BY MR. JAVED:

16 Q. But your construction in the IPR
17 declaration and the claim construction declaration
18 is different; correct?

19 A. I think I just explained my analysis,
20 which in the IPR declaration I focused on a
21 dictionary definition, and I included those
22 dictionary definitions in my claim construction

1 analysis. And I explained further how with, no
2 written description support, a person of skill
3 wouldn't understand the full scope of the term in
4 the context of the '815 patent.

5 And with that additional analysis I did
6 in the claim construction -- in my claim
7 construction declaration, then, yes, I agree they
8 are -- there's additional analysis in the claim
9 construction declaration that is not in my IPR
10 declaration.

11 Q. But I just wanted a yes-or-no answer.
12 Because looking at your claim construction
13 declaration, your construction here for "user
14 profile" is indefinite, while in the IPR
15 declaration, you have construed this term as
16 requiring data representing distinctive features
17 and characteristics of a user.

18 So to me, they're two different
19 constructions; correct?

20 MR. SUNG: Objection; form.

21 THE WITNESS: I think I just explained
22 my analysis in each declaration and how they are

1 different and why.

2 BY MR. JAVED:

3 Q. Dr. Bederson, you just mentioned that
4 the term "user profile" is not disclosed in the
5 '815 patent.

6 Does a term have to be included in the
7 specification verbatim?

8 A. I'm sorry, I didn't understand the last
9 few words. Could you repeat your question?

10 Q. Yeah.

11 My question is: Like, does a term --
12 does a term from the claims, which is disclosed in
13 the claim, does it have to be included verbatim in
14 the specification of a patent?

15 A. That sounds like a legal question. I'm
16 not a lawyer. So I don't have an opinion about
17 the requirements of where a term may -- what the
18 requirements of a term are.

19 But what I explained in my claim
20 construction declaration is that the claim term
21 "user profile" does not appear anywhere in the
22 specification of these applications.

1 But based on my analysis of how the term
2 is used in the various claims, a person of skill
3 in the art would understand that the first user
4 profile, whatever it may be, must be something
5 more and different from both the first character
6 and the identity of the videos associated with the
7 first character.

8 Q. Going back to your construction in the
9 IPR declaration, where you have used the words
10 "features and characteristics of a user," could a
11 feature be a user-defined information?

12 A. Well, I think as I said, a person of
13 skill in the art reading the '815 patent really
14 wouldn't know what they meant by the term "user
15 profile" beyond the fact that it must be something
16 different than a first character and the identity
17 of the videos associated with the first character.

18 I did explain that there are various
19 dictionary definitions that I relied on in both my
20 IPR and claim construction declaration that lends
21 some light. But beyond that, I don't have any
22 additional opinions about what may or may not be

1 parts of a user profile since I don't think the
2 '815 patent would help a person of skill in the
3 art understand that.

4 Q. I'm just trying to understand your
5 construction in the IPR declaration where you have
6 used the word "distinctive features." And I just
7 want to get some examples.

8 And does this "distinctive features of a
9 user" include some information selected by the
10 user which is unique to that user or some
11 user-defined information? Will that be a distinct
12 feature for that user?

13 A. I mean, I haven't done an analysis of
14 that. So I don't know that I have a specific
15 answer to your question. I did explain in my IPR
16 declaration that I got this language, including
17 "distinctive features and characteristics of a
18 user," from a dictionary definition. And I
19 further provided an additional dictionary
20 definition that did give some examples of things
21 that could be information contained in a user
22 profile.

1 But as I said, in the '815 patent,
2 beyond distinguishing a user profile from a first
3 character and the identity of the videos
4 associated with the first character, there's
5 really no information to help a person of skill in
6 the art understand what was meant by that term.

7 Q. Looking at paragraph 83 of your claim
8 construction declaration, you have provided a
9 definition from Wiley Electrical and Electronics
10 Engineering Dictionary, which says that, "This
11 definition underscores that" -- sorry.

12 After the definition of "user profile,"
13 you state in the last sentence in that paragraph
14 that, This definition underscores that a "user
15 profile" is a collection of various data -- data
16 points related to a user, including their
17 preferences, settings, authorizations, and e-mail
18 address.

19 So when you state that -- "the
20 collection of various data related to a user,"
21 does that include user-defined or user-selected
22 information in a specific folder?

1 A. Well, this definition in my claim
2 construction declaration, paragraph 83, does
3 provide some additional examples of information
4 that could be included in a user profile, as you
5 pointed out, including the preferences, settings,
6 authorizations, and e-mail addresses. So I agree
7 that those would be additional examples that a
8 person of skill in the art would understand.

9 But the '815 patent really doesn't
10 provide any other examples and does not provide
11 any clarity to a person of skill in the art
12 reading the patent beyond that the user profile
13 must be something different than the first
14 character and the identity of the videos
15 associated with the first character.

16 And I have not formed additional
17 opinions about other hypothetical examples that
18 may or may not be part of the user profile.
19 Because as I said, I don't think that the '815
20 patent provides any information to help a person
21 of skill in the art understand that term and what
22 may or may not be inside the scope of that term.

1 Q. Let's go back page 17 of your claim
2 construction declaration. And see the figures
3 which you have pasted here above paragraph 46?

4 A. Okay.

5 Q. So here, Figure 6 and 7 disclose two
6 different users who have two different set of
7 video information associated with them.

8 Do you see that?

9 A. Well, let me start by saying that you
10 characterize these as users, but I don't see the
11 '815 patent describing these figures as disclosing
12 users. Oh, sorry, I take it back, it does. So --
13 all right. It does refer to 601 as a menu display
14 tag for user No. 1.

15 So, sorry, I got distracted, can you ask
16 your question again?

17 Q. Yeah.

18 So looking at these pictures -- these
19 figures, sorry, Figure 6 and 7, that is related to
20 user No. 1, for example, "mother," and user No. 2
21 disclosed as "father," and the information -- the
22 data information associated with them is

1 different, it's not the same.

2 Can you confirm that, that that's right?

3 A. I think that's right. It shows --
4 Figure 6 and Figure 7 shows different information,
5 and that different information is videos and the
6 play lists associated with that user.

7 Q. I'm now going back to paragraph 83,
8 where you explain the definition from Wiley
9 Electrical and Electronics Engineering Dictionary,
10 the last sentence again where you state, This
11 definition underscores that a "user profile" is a
12 collection of various data -- data points related
13 to a user, including their preferences.

14 So wouldn't a POSITA looking at Figure 6
15 and 7 see two different users having two different
16 data points associated with their profiles?

17 A. Well, your question ignores what I've
18 been explaining in my opinion which comes from --
19 which I've stated in paragraph 79, which is the
20 claims make it quite clear to a POSITA that the
21 first user profile must be something different
22 from both the first character and the identity of

1 the videos associated with the first character.

2 And what we see in Figures 6 and 7 is
3 the identities of video -- the identity of videos
4 associated with the first character. And so that
5 information cannot be profile information.

6 Q. So going back to Figure 6, the video
7 information 402 and 502, aren't these collection
8 of various data points related to the user
9 "mother"?

10 A. Well, if we see what the '815 patent
11 says about them, it will be quite clear that what
12 I said in my previous answer is right, which is
13 they identify videos associated with the first
14 character, "mother."

15 So in Column 6, starting at line 23, it
16 says, As appreciated -- this is a description of
17 Figure 6.

18 It says, As appreciated from Figure 1,
19 reference numerals 402 and 502 designate
20 thumbnails indicating the program information
21 number 1 and the play list information number 1,
22 respectively.

1 So as I said, that is a disclosure of
2 videos associated with the first character and,
3 because of the claims, cannot meet the user
4 profile.

5 Q. Yeah. Going back to, again, Column 6
6 and the lines you read. Right after where you
7 stopped, the next line says -- this is line
8 No. 25, Column 6 -- "The 'mother' can use the menu
9 display tag for mother 601 as a folder dedicated
10 to herself, and freely register and delete data to
11 be reproduced."

12 Isn't that what you described in
13 paragraph 83, a collection of various data points
14 related to a user?

15 A. No, because -- well, let me clarify.

16 No, it cannot meet user profile for the
17 reasons that I explained that it is -- that
18 sentence that you just described explains the
19 adding and removing of videos from a play list.
20 And so that is videos -- those are videos
21 associated with the first character. So based on
22 the claims themselves, they cannot meet user

1 profile information.

2 And I did actually directly address that
3 sentence in a different section of my report, in
4 paragraph 66, about the previous term. And I
5 explain that that supports modifying groups of
6 video information, such as by adding and deleting
7 items of video information from a group.

8 So, in other words, that is further
9 disclosure of managing the identities of videos
10 associated with the first character, which cannot
11 be user profiles.

12 Q. I'm trying to understand your definition
13 and your explanation in paragraph 83, where you
14 say, the "user profile" is a collection of various
15 data points -- various data points related to a
16 user.

17 And looking back at Figure 6, you agree
18 that "mother" is a user, "father" is a user, and
19 you also agree that there are unique data points
20 in each of these folders; am I right?

21 A. Well, that's partially right, but you've
22 ignored the totality of my analysis. As I've

1 explained, my analysis is quite clear that the
2 claims themselves distinguish the term "user
3 profile" from the first character and the identity
4 of the videos associated with the first character.

5 And since Figures 6 and 7 disclose
6 identity of videos associated with the first
7 character, they cannot be the user profile.

8 MR. JAVED: Okay. No further questions
9 on my end, Dr. Bederson. I appreciate your time
10 today. Thank you.

11 THE WITNESS: Thank you.

12 MR. SUNG: I have a few questions for
13 Dr. Bederson.

14 EXAMINATION BY COUNSEL FOR THE DEFENDANTS

15 BY MR. SUNG:

16 Q. Dr. Bederson, I have a few questions
17 about Exhibit 4 Maxell's counsel marked today in
18 view of Figure 4 through 7 from the '815 patent
19 that are reproduced on page 17 of your claim
20 construction declaration.

21 Feel free to look at that on the screen
22 or on the table.

1 A. Okay.

2 Q. Looking at Exhibit 7 [sic], I'm

3 referring to page 9 of Exhibit 4.

4 A. I'm sorry, did you say Exhibit 7?

5 Q. Sorry, Exhibit 4, page -- PDF page 9.

6 You will see numerous colored images.

7 A. Okay.

8 Q. And I would like to direct your
9 attention to the sixth line from the bottom, where
10 the first two images are yellow manila file
11 folders.

12 Let me know when you see that.

13 A. Just to clarify, on the sixth line from
14 the bottom, I think it's the image number -- it's
15 the second and third image from the left?

16 Q. Correct.

17 The image code that we're seeing here
18 is -- the first one is f09f9381. And the other
19 one that I'm seeing right now is f09f9382.

20 Do you see those two?

21 A. I do.

22 Q. Can you see small colored tabs within

1 those images, one in green and one in red? It's
2 very small. So feel free to zoom in, if
3 necessary.

4 A. Yes, I see those.

5 Q. Do you have any reason to believe that
6 they are dynamically changed in any shape or form
7 if a user clicks on the color tab portion of the
8 image?

9 MR. JAVED: Objection; form.

10 THE WITNESS: Well, those images are in
11 this section titled "symbols and emojis." So I
12 think -- while I haven't analyzed these particular
13 images before, I think a person of skill in the
14 art would recognize that these are just symbols or
15 emojis, and they by themselves don't specify any
16 interaction.

17 BY MR. SUNG:

18 Q. Do you have any reason to believe that
19 those tabs depicted in these two images are
20 functionally the same as those in Figures 4
21 through 7 in the '815 patent?

22 MR. JAVED: Objection; form.

1 THE WITNESS: Well, as I said, these are
2 just characters from a list of symbols and emojis.
3 So I don't think they by themselves provide any
4 interaction. They also only show a single tab as
5 opposed to Figures 4, 5, 6, and 7 of the '815
6 patent, which display multiple tabs along with a
7 description of some of that interaction.

8 BY MR. SUNG:

9 Q. So now turning your attention to the
10 '815, specifically Figures 4 through 7, which
11 again are reproduced in your claim construction
12 declaration on page 17, right above paragraph 46.

13 Do you see the tabs, T-A-B-A -- I'm
14 sorry, strike that.

15 Do you see the tabs, T-A-B-S, for menu
16 display tags, T-A-G-S, in these figures?

17 A. No, I do not.

18 Q. I'm referring to the Roman numerals for
19 401, 601, 501, 701.

20 Do you see those in the figures?

21 A. I do.

22 Q. Based on your analysis of the '815

1 patent, do those tabs, 401, 406 [sic], 501, 701,
2 are those dynamically changed in any shape or form
3 depending on the user selection?

4 MR. JAVED: Objection; form.

5 THE WITNESS: So just to clarify, I
6 think you might have misspoke because you said
7 "406." So maybe you're referring to 401, 501,
8 601, and 701?

9 BY MR. SUNG:

10 Q. That's correct. Let me restate my
11 question there.

12 Based on your analysis of the '815
13 patent, do those tabs, 401, 501, 601, 701,
14 dynamically change in any shape or form depending
15 on the user selection?

16 A. Yes, that is described in the
17 specification. So, for example, in Column 6,
18 starting at Row 14, the '815 patent says, "By the
19 way, display switching from the all program
20 display tag 401 to all play list tag can be
21 implemented by, for example, movement of the
22 cursor in tag character positions conducted by the

1 user."

2 And looking carefully at Figure 4 and
3 Figure 5, it is clear that Figure 4 shows the
4 401 tab being the leftmost tab and Figure 5, the
5 501 tab, being the second tab.

6 So given those two figures, the
7 knowledge of a POSITA, and this description in
8 Column 6 that I just read, it's clear that when a
9 person would move the cursor within the tag or tab
10 to click on, for example, a character position
11 of -- in the second tab, assuming that they could
12 actually see a particular character, then that
13 would result in a switch to the folder display of
14 Figure 5. I will note, though, that Figure 4
15 doesn't actually display a character in the second
16 tab to click on.

17 MR. SUNG: I have no further questions.
18 I yield the witness.

19 MR. JAVED: No further questions from
20 me, also. Thank you.

21 THE WITNESS: Thank you.

22 (Off the record at 1:23 p.m.)

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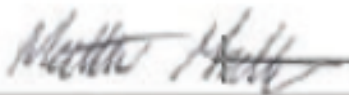
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Matthew Goldstein, RMR, CRR

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