

Page 1

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

-----X

TIKTOK, INC.,

Petitioner,

v.

CELLSPIN SOFT, INC.,

Patent Owner,

-----X

IPR2024-00757

U.S. Patent No. 8,756,336B2

IPR2024-00759

U.S. Patent No. 8,862,757 B2

IPR2024-007 60

U.S. Patent No. 8,898,260 B2

-----X

REMOTE DEPOSITION OF
PAVAN M. GAJENDRAGAD
Friday, March 21, 2025

Reported By: Randi J. Garcia, RPR

DIGITAL EVIDENCE GROUP
1730 M. Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

1 Transcript of the deposition of
2 PAVAN M. GAJENDRAGAD, called for Oral
3 Examination in the above-captioned matter,
4 said Deposition being taken pursuant to
5 Federal Rules of Civil Procedure by and
6 before RANDI J. GARCIA, Registered
7 Professional Reporter, and Notary Public, via
8 Zoom, on Friday, March 21, 2025, commencing
9 at approximately 2:00 p.m.

10

11

12

13

14

15

16

17

18

19

20

21

22

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

2 Counsel for Petitioner.

3 Fish & Richardson, P.C.

4 By: Ricardo Bonilla, Esq.

5 1717 Main Street

6 Suite 5000

7 Dallas, TX 75201

8 and...

9 Fish & Richardson P.C.

10 By: Kim H. Leung, Esq

11 60 South Sixth Street

12 Minneapolis, MN 55402

13

14 Counsel for Patent Owner

15 Garteiser Honea

16 By: Rene A. Vazquez, Esq.

17 119 West Ferguson

18 Tyler, Texas 75702-7203

19

20

21

22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

I N D E X

WITNESS: PAVAN M. GAJENDRAGAD

EXAMINATION

PAGE

By Mr. Bonilla:	6
By Mr. Vazquez:	89
By Mr. Bonilla:	91

* * *

1	INDEX TO EXHIBITS		
2			
3	EXHIBIT	DESCRIPTION	PAGE
4			
5	Exhibit 1	Final Gajendragad	33
6		Declaration	
7			
8	Exhibit 2	-00757 - '336 Patent	41
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			

1 P A V A N G A J E N D R A G A D, after
2 having been first duly sworn, was examined
3 and testified as follows:

4 EXAMINATION

5 BY MR. BONILLA:

6 Q. Good morning, sir. Would you please
7 state and spell your name for the record.

8 A. I am Pavan Gajendragad, P-A-V-A-N,
9 G-A-J-E-N-D-R-A-G-A-D.

10 Q. Have you been deposed before?

11 A. No.

12 Q. Have you ever testified in a trial
13 before?

14 A. No.

15 Q. Do you understand why you're here
16 today?

17 A. Yes, I do.

18 Q. What is your understanding of what we
19 are doing here today?

20 A. So I'm trying -- I'm here to give my
21 expert opinion.

22 Q. And your expert opinion on behalf of

1 CellSpin Soft Incorporated?

2 A. Yes. That is correct.

3 Q. You understand that they're the
4 patent owner in these proceedings?

5 A. Yes, I do.

6 Q. And did you prepare a report or
7 declaration in support of CellSpin Soft's
8 positions in these proceedings?

9 A. Yes.

10 Q. Have you --

11 A. You are an attorney?

12 Q. Yes. So I am an attorney -- good
13 question. I'm an attorney for the petitioner,
14 for TikTok.

15 A. Okay.

16 Q. And so I'm going to be asking you
17 some questions mostly about your -- about you
18 and your declaration in these proceedings,
19 limited to three of them. I believe you
20 actually provided opinions on seven patents; is
21 that right?

22 A. Yes.

1 Q. We are going to talk about three of
2 them today. Is that okay?

3 A. Yeah.

4 Q. Did you do anything to prepare for
5 this deposition today?

6 A. Well, I read my report.

7 Q. What else?

8 A. Just had a good breakfast.

9 Q. What else?

10 A. That's about it. Yeah.

11 Q. When did you read your report?

12 A. Last night, I guess.

13 Q. About how long did it take you to
14 read it?

15 A. Took me quite a while, about an hour,
16 hour and a half.

17 Q. Did you meet with anyone in
18 preparation for your deposition today?

19 A. No.

20 Q. Did you speak with anyone in
21 preparation for your deposition today?

22 A. No.

1 Q. Do you know who Mr. Vazquez is here?

2 A. Yes, I do.

3 Q. When was the last time you spoke with
4 him?

5 A. I mean, just this morning he sent --
6 he confirmed if I had got the Zoom invite or
7 not.

8 Q. And before this morning, when was the
9 last time you spoke with Mr. Vazquez?

10 A. A few days ago.

11 Q. And you know who CellSpin is here?

12 A. Yes.

13 Q. Do you know the CEO and president of
14 CellSpin?

15 A. Yes, I know.

16 Q. You know Gurvinder Singh?

17 A. Yes.

18 Q. How do you know him?

19 A. We worked -- I worked with him at
20 SoftBank.

21 Q. When was that?

22 A. 2018 and 2019.

1 Q. And between 2018/2019 when you worked
2 with him at SoftBank, and when you were
3 contacted about this matter, had you spoken
4 with Mr. Singh in that time?

5 A. No.

6 Q. How were you first contacted about
7 this matter?

8 A. When we were -- I don't recall. Back
9 in October/November, I think, I was asked if
10 you want to take it up by giving it a thought,
11 and I said okay.

12 Q. And your purpose in this proceeding
13 is to act as an expert witness; is that
14 correct?

15 A. That is right.

16 Q. Have you been an expert witness in
17 the past?

18 A. No.

19 Q. This is your first time being an
20 expert witness?

21 A. Like I said, yes.

22 Q. And who contacted you about being

1 retained by CellSpin for this matter?

2 A. Initially Bobby contacted me. And
3 after that, the counsel came in the picture.
4 And after that, it's only been counsel, yeah.

5 Q. And when you say Bobby, you're
6 referring to Mr. Singh?

7 A. Yes.

8 Q. Do you know who Marcos Klein is?

9 A. Say that again.

10 Q. Marcos Klein, do you know who that
11 is?

12 A. No.

13 Q. Do you know who Vince Laviano is?

14 A. Vince Laviano, let me recall it.
15 Yeah, I think they are the inventors of the --
16 of -- of CellSpin's patent, I think.

17 Q. They are -- I'm not trying to trick
18 you or anything. They are listed as the
19 inventors on these patents.

20 Do you know either of those two
21 individuals personally?

22 A. No, I don't.

1 Q. Have you ever spoken with them,
2 either of them?

3 A. No.

4 Q. Have you ever spoken with anyone
5 employed by TikTok?

6 A. No.

7 Q. I want to ask you some questions
8 about your background. Is that okay?

9 A. Sure.

10 Q. Did you graduate from high school?

11 A. Yes.

12 Q. When was that?

13 A. High school was 1998.

14 Q. Where?

15 A. In India.

16 Q. Where in India?

17 A. Bangalore, India.

18 Q. Did you further your education after
19 high school?

20 A. Yes. I did my BS in instrumentation
21 technology at Visveswaraiah Institute of
22 Technology in India.

1 Q. When you say BS, is that a degree, a
2 bachelor of science?

3 A. Yes.

4 Q. Did you obtain any other degrees?

5 A. Yes. I also went on and got my
6 master's education in the U.S.

7 Q. And what did you get your master's
8 in?

9 A. Telecommunications and management.

10 Q. From what institution?

11 A. University of Maryland College Park.

12 Q. Did you physically attend that
13 university or was it an online program?

14 A. I physically attended.

15 Q. When did you obtain your master's
16 degree?

17 A. 2008, summer of 2008.

18 Q. So I have bachelor's of science and a
19 master's degree. Did you obtain any other
20 degrees?

21 A. No.

22 Q. I should have asked this before. I

1 noticed you had some papers there in front of
2 you. Can you tell me what you've got there?

3 A. It's my resume.

4 Q. I can't see it, but that's okay. Do
5 you have anything other than your resume in
6 front of you?

7 A. I have my report. (indicating).

8 Q. And is that report annotated? Have
9 you drawn on it?

10 A. I have made some notes, yeah.

11 Q. Do you have anything else in front of
12 you?

13 A. Like a water bottle.

14 Q. Anything else?

15 A. A cup of tea.

16 Q. Anything else?

17 A. That's it.

18 Q. Do you have any -- other than the
19 Zoom application that we are conversing through
20 right now, do you have any other applications
21 open on your computer?

22 A. No.

1 Q. Do you have your cell phone with you?

2 A. Yes, I do.

3 Q. Is it on?

4 A. It's in airplane mode. I don't want
5 to be disturbed. It is for like checking the
6 time.

7 Q. And where are you physically located
8 at the moment?

9 A. San Jose.

10 Q. Where in San Jose? Where are you?

11 A. Metro Drive, San Jose.

12 Q. Is that an office? Is it your
13 residence?

14 A. It is very close to my office.

15 Q. Very close to your office. Is it
16 where you live?

17 A. I live in Sacramento, but I work in
18 San Jose.

19 Q. So where, that is not your office and
20 not your home, are you right now?

21 A. So I'm in -- I have a small place
22 here. So because I commute every week, so I

1 have a small place here. So I'm there right
2 now.

3 Q. Is there anyone else there with you?

4 A. No.

5 Q. Are you in communication with anyone
6 via any means, other than those of us on this
7 Zoom?

8 A. No.

9 Q. I want to ask you a little about your
10 work experience. What was your first job?

11 A. So I worked at Mistral Affair,
12 M-I-S-T-R-A-L, Mistral Affair, Bangalore. It's
13 a software company.

14 Q. And what was your role at Mistral?

15 A. I was a test engineer. I was testing
16 a protocol called UWB protocol, which is
17 similar to Bluetooth.

18 Q. What do you mean by that, similar to
19 Bluetooth?

20 A. It is a close-range protocol. So
21 communication between mobile-to-mobile or any
22 device that like transferring files between

1 peers, like, say, person A was standing next to
2 person B, things like that. It's a wireless
3 protocol. And it's similar. So once the file
4 is transferred, my job was to check if it is --
5 if the file -- received file and the
6 transferred file are the same, or if they are
7 not the same, how different they are, are there
8 any error beds. In short, it's a short range,
9 communication protocol.

10 Q. When were you first hired for that
11 role at Mistral?

12 A. It was 2005 January.

13 Q. Was test engineer the only role you
14 had at Mistral?

15 A. Yes.

16 Q. How long were you in that position?

17 A. I was there till August of 2005.

18 Q. What did you do after that?

19 A. I joined Infosys. It's another
20 software company.

21 Q. In August 2005?

22 A. No, in November.

1 Q. What was your role at Infosys?

2 A. I was again a test engineer. Yeah,
3 software test engineer.

4 Q. And what were you testing?

5 A. I was primarily testing the banking
6 software server performance.

7 Q. You said banking software?

8 A. Banking software and server
9 performance.

10 Q. Server performance.

11 A. Application server performance.

12 Q. Can you give me a little bit more
13 specificity there when you say banking
14 software? What kind of software were you
15 working on?

16 A. So it was a banking software. To go
17 a little more deeper into it, it's like what we
18 use on our every day banking, to transfer
19 money, and I tested the security associated
20 with it, also the server performance and
21 networking, like the whole implementation of
22 the client server architecture testing that --

1 how the communication happens between the
2 client and server, such things. So there were
3 test cases that I was supposed to design and
4 then test them.

5 Q. Did you work on closed circuit or
6 nearby communication protocols when you were at
7 Infosys as well?

8 A. No.

9 Q. So you didn't do any work on
10 Bluetooth or similar technologies while you
11 were at Infosys?

12 A. Not short-range communication, but in
13 more -- more like server, client server
14 communication.

15 Q. Your focus -- is it fair to say your
16 focus was on software and not hardware?

17 A. At Infosys it was software. At
18 Mistral it was hardware and software.

19 Q. How long were you in that position?

20 A. With Infosys about eight months,
21 seven months.

22 Q. And did you have any other roles at

1 Infosys?

2 A. I was the lead engineer there. That
3 is it. So that required me to get some more,
4 like speak with some other -- other teams
5 and...

6 Q. What do you mean by that?

7 A. So parallel teams will be -- so at
8 any meetings and because they have their own
9 deliverables before the testing should take
10 up -- testing, so if they finished the
11 development, the test teams will take up
12 testing. So things like that. Yeah.

13 Q. When did you leave Infosys?

14 A. Just before I got an admit from the
15 University of Maryland, July 2006.

16 Q. So what did you do after July 2006?

17 A. I came to the U.S. for my master's.

18 Q. How long were you in your master's
19 program in the U.S.?

20 A. Till August 2008.

21 Q. Did you work while you were studying
22 at Maryland?

1 A. Yes, I did.

2 Q. What did you do?

3 A. I was the network administrator for
4 the university counseling center, so --

5 Q. Of the University of Maryland?

6 A. Yes. And web developer there.

7 Q. Did you do that during your entire
8 two years of study?

9 A. Not entire two years. After a year I
10 think I started there, yeah. So from June 2007
11 to May of 2008.

12 Q. You got your degree, you said, in
13 August of 2008?

14 A. Yeah.

15 Q. What did you do after that?

16 A. After that I joined Caritor. Oh, I
17 also interned at Ericsson.

18 Q. When did you intern at Ericsson?

19 A. June to September.

20 Q. Of which year?

21 A. 2008. Soon after I graduated.

22 Q. What did you do in your internship at

1 Ericsson?

2 A. So they had -- it was a small stint.
3 My job was to organize the internal documents
4 so that they are more easily accessible.

5 Q. What did that entail?

6 A. So they have a lot of the --
7 Ericsson's GSM network documentations. So like
8 if you go on website, you have to organize the
9 documents in a certain way that is more
10 intuitive. Like, all the documents pertaining
11 to the GSM network per se should go into a
12 single folder. It is more like a bookkeeping
13 and organization. And also in that process, I
14 also learned tools like Rational Robot and
15 Rationale ClearQuest. They are test tools.

16 Q. Was that internship a paid position?

17 A. Yes.

18 Q. What did you do after that?

19 A. After that I got a job at Airvana.
20 It was based in Chelmsford, Massachusetts. I
21 was a test engineer there.

22 Q. When did you start at -- sorry, you

1 said -- what was the name of the company?

2 A. Airvana. A-I-R-V-A-N-A.

3 Q. And when did you start at Airvana?

4 A. October of 2008.

5 Q. As a test engineer?

6 A. Yes. Systems test engineer.

7 Q. And what were you testing, other than
8 systems?

9 A. My primary job was to test the
10 system, so systems --

11 Q. What system?

12 A. So EV-DO, RNC system, it's a
13 telecommunication -- RNC basically your 3G, 4G
14 systems. So the RNC is what sits in the base
15 station. We used to make boards that go in the
16 base station, and then the software that goes
17 on that, so how much capacity it can withstand,
18 how many users it can support at a single time,
19 a system capacity test.

20 Q. Did you ever physically make any of
21 those boards?

22 A. My company did, yes.

1 Q. Did you yourself?

2 A. My job was to do the testing on the
3 boards. Not designing those boards.

4 Q. How long were you in that position?

5 A. I was there till May of 2010.

6 Q. And did you have the same
7 responsibilities throughout the almost two
8 years that you were at Airvana?

9 A. Yes. Mostly, yes.

10 Q. What did you do after May of 2010?

11 A. I joined Qualcomm in San Diego.

12 Q. And when did you start at Qualcomm?

13 A. Qualcomm I started in July 2010.

14 Q. What was your role at Qualcomm?

15 A. My role at Qualcomm was, again,
16 systems test engineer, write test trips, test
17 reports, test plans, on various wireless
18 communications -- communication, like including
19 but not limited to Bluetooth.

20 Q. I'm sorry to interrupt. Would you
21 please list for me the wireless protocols that
22 you tested at Qualcomm?

1 A. Sure. LTE, UMTS, EV-DO, Wi-Fi,
2 Bluetooth. Yeah. Those are the wireless
3 technologies. Then there are SIP, S-I-P. What
4 else?

5 Q. Did you ever work or test UMB, Ultra
6 Mobile Broadband?

7 A. UMB? It's UMTS.

8 Q. Yeah.

9 A. UMTS.

10 Q. With respect to Wi-Fi, did you ever
11 test WiMAX?

12 A. WiMAX, I did do that, yes.

13 Q. At Qualcomm?

14 A. Yes. Not substantially, but I did do
15 that.

16 Q. How long were you at Qualcomm?

17 A. Qualcomm I was there 2014 December.
18 December of 2014.

19 Q. What did you do after December 2014?

20 A. So I tried to get more expertise on
21 the data side and on the monetization of the
22 AdTech and all that.

1 Q. You said you wanted to get more
2 experience with the data side. What do you
3 mean by that?

4 A. The data side is the data signs,
5 machine learning, data cleaning, data analysis,
6 exploratory data analysis, prediction. So I
7 invested time there for a couple of years. And
8 I also headed a start-up in India.

9 Q. You said you invested some time there
10 for a couple of years. What do you mean by
11 that?

12 A. I got certifications, R
13 certification. I got Tableau certification.
14 Yes.

15 Q. Any other certifications?

16 A. Exploratory data analysis
17 certification. Cleaning data certification.
18 Yeah.

19 Q. You mentioned a start-up in India.

20 A. It's not --

21 Q. Explain that to me.

22 A. It was not -- nothing substantial.

1 Just held start-up to also look into these new
2 fields, new technologies which were coming up
3 at that time.

4 Q. What was the name of the start-up?

5 A. So I don't quite recall it. I mean,
6 it was -- I don't recall. I don't want to say
7 something that is incorrect.

8 Q. That's okay. What field was the
9 start-up in?

10 A. So like AdTech.

11 Q. And what do you mean by that?

12 A. AdTech is basically using the profile
13 data of a person to display ads on its mobile
14 phone.

15 Q. Is that start-up still in existence?

16 A. I don't know actually. I haven't
17 spoken to them for a long time. I haven't...

18 Q. When you say "them", who is them?

19 A. Sorry.

20 Q. When you say "them", who is them?

21 A. It is my friend's start-up at that
22 time. I have lost touch with him.

1 Q. Can you tell me your friend's name?

2 A. Yeah.

3 Q. What is your friend's name?

4 A. Veno.

5 Q. Last name?

6 A. Veno Jopal, V-E-N-U-J-O-P-A-L. It
7 was a long time ago, so I don't quite
8 recollect.

9 Q. And how long were you doing these two
10 roles?

11 A. What two roles?

12 Q. Getting your certifications and
13 assisting the start-up.

14 A. Assisting the start-up was very
15 brief, like three, four times I discussed with
16 them. That's about it. But primarily, my
17 focus was to improve my skill set.

18 Q. And how long were you working on
19 improving your skill set?

20 A. Two years.

21 Q. To December of 2016?

22 A. So 2015, the whole of 2015 and whole

1 of 2016.

2 Q. And what did you do after 2016?

3 A. I joined Cinarra Systems, which later
4 got acquired by SoftBank.

5 Q. When did you join Cinarra?

6 A. March of 2017.

7 Q. What was your role?

8 A. My role there is senior data
9 analysis.

10 Q. What kind of data were you analyzing?

11 A. Say that again.

12 Q. What kind of data were you analyzing?

13 A. All kinds of data, like AdTech data,
14 wireless data, profile database, making
15 profiles of the user, the location data. Yeah,
16 that is about it.

17 Q. Were -- was your focus on design,
18 implementation or testing?

19 A. It depends on the project. So I have
20 been involved with testing. I have been
21 involved with designing. Yeah.

22 Q. I'm asking specifically about your

1 time at Cinarra, what was your --

2 A. Yeah, yeah. So because it's since
3 2017 I'm there, at various stages I have done
4 all of them. Like analysis, design,
5 implementation, execution, all of that.

6 Q. How long were you at Cinarra?

7 A. Oh, I'm still working at Cinarra.

8 Q. You said it was acquired by who?

9 A. SoftBank.

10 Q. Sorry?

11 A. SoftBank.

12 Q. SoftBank. So you're still in that
13 role?

14 A. Yes.

15 I have one request. So I like to
16 take a break every hour, five, 10 minutes.

17 Q. I was planning on doing the same.
18 Certainly, if at any point you want to take a
19 break, just let me know. The only thing I will
20 ask is if I have a question pending to you,
21 that you answer the question before we take a
22 break.

1 Would you like to take a break right
2 now? I know it is your first deposition and we
3 have been going for 30 minutes. We can take a
4 couple minutes.

5 THE WITNESS: All right.

6 MR. BONILLA: Let's go off the record
7 for a few minutes.

8 (Thereupon, a brief recess was taken.)

9 BY MR. BONILLA:

10 Q. Are you a member of any professional
11 organizations?

12 A. Can you explain more.

13 Q. Sure. Things like the Professional
14 Society of Engineers, or the International
15 Standard Setting Organization, IRC, things like
16 that.

17 A. Not currently.

18 Q. Have you ever been a member of a
19 professional organization?

20 A. I used to be a member of ISA,
21 Instrumentation Association Society.

22 Q. And when were you a member of that

1 organization?

2 A. When I was doing my bachelor's back
3 in 2004, 2003, 2004.

4 Q. Was it just 2003 or 2004?

5 A. Yeah.

6 Q. And did you hold any leadership
7 positions within the organization?

8 A. No. I was a member. That's it.

9 Q. Have you been a member of any
10 professional organizations?

11 A. No. I don't recall.

12 Q. Are you aware if you're listed as an
13 inventor on any US patents?

14 A. No.

15 Q. Have you ever -- sorry, go ahead.

16 A. I wish.

17 Q. Have you ever applied for a US
18 patent?

19 A. No.

20 Q. So what I'm going to do here is I'm
21 going to drop into the chat our first, of what
22 I hope be, very few exhibits.

1 (Thereupon, Exhibit 1 was marked for
2 identification.)

3 BY MR. BONILLA:

4 Q. Can you see that exhibit?

5 A. Exhibit 2001?

6 Q. Yes. Can you please open that.

7 And Mr. Vazquez, can you see this as
8 well.

9 MR. VAZQUEZ: I can.

10 MR. BONILLA: Ms. Court Reporter, are
11 you good too?

12 THE REPORTER: Yes.

13 Q. You have this document Exhibit 2001
14 in front of you?

15 A. Exhibit 2001?

16 Q. It's a document that bears the,
17 "Declaration of Pavan Gajendragad".

18 A. Yes, Final Pavan Gajendragad
19 Declaration.

20 Q. That is the title of the file;
21 correct?

22 A. Yes.

1 Q. Do you recognize this document?

2 A. Yes.

3 Q. How do you recognize it?

4 A. It is my document.

5 Q. And is that your signature on the
6 front of it?

7 A. Yes, it's mine.

8 Q. Is it your declaration prepared and
9 submitted in the three IPR proceedings listed
10 on the front first page?

11 A. Yes.

12 Q. And I understand that this same
13 declaration was submitted in all three of the
14 '757, '759, and '760 proceedings; correct?

15 A. Yes.

16 Q. Is it fair to say that your opinions,
17 as reflected in this document, are the same
18 across all three of those IPR proceedings?

19 A. Yes.

20 Q. Did you write this document?

21 A. Largely, yes.

22 Q. Sorry?

1 A. I mean, my counsel helped me a little
2 bit.

3 Q. Can you just tell me that process,
4 how did this document come to be?

5 A. So I would -- I would read up the
6 patents and I worked with my counsel to
7 establish a process for fine tuning it and
8 using the proper language and all. Yeah.

9 Q. The first draft of this document, who
10 prepared that?

11 A. The first draft, I don't recall the
12 first draft. I have my notes. Yeah.

13 Q. You don't recall who prepared the
14 first draft?

15 A. The first draft I think I gave my
16 notes like I had made a lot of notes on --

17 Q. And just to be clear, I don't want to
18 know what you shared with counsel and what they
19 shared with you in preparing the draft. I just
20 want to know who created the first one, if you
21 can recall it.

22 A. I think it is my counsel's call, I

1 think.

2 Q. Do you have an understanding of what
3 an inter partes review is?

4 A. I think I do, but if you can
5 elaborate, I would appreciate that.

6 Q. I actually would like to know what
7 your understanding of an inter partes review
8 is.

9 A. So basically to review all the
10 patents and see if -- if the -- if that
11 invalidation -- like at the PTAB there is --
12 like to invalidate a patent, is that accurate
13 argument, things like that. Yeah.

14 Q. And so what did you understand your
15 -- what do you understand your role to be in
16 these three inter partes review proceedings?

17 A. So to show the glaring shortcomings
18 of the argument put forth by the petitioner.

19 Q. And is it only to show the glaring
20 shortcomings?

21 A. Largely.

22 Q. What do you mean by that?

1 A. It's not like going into
2 implementation details. Not like trying to see
3 -- trying to make it work or like it's --
4 somehow it's like trying to see if what are the
5 shortcomings in the argument. If, like say,
6 two different patents can be combined to
7 achieve what CellSpin has achieved. What is --
8 if it was obvious back in 2007 or 2008, if this
9 could be done generally speaking, yeah. So
10 that is -- that is what I understand.

11 Q. So I want to be fair to you. You
12 said "make it work." What did you mean by
13 that?

14 A. So make it work, let me take a moment
15 to think and --

16 Q. Please take your time.

17 A. To see if it was obvious for these --
18 combining these two patents and make it work.
19 So that was my line of thought.

20 Q. Have you seen the patent owner's
21 responses in these three proceedings?

22 A. Yes.

1 Q. Did you help in preparing the
2 responses, the patent owner responses in these
3 three proceedings?

4 A. I prepared them myself.

5 Q. You mean you prepared the patent
6 owner response or your declaration?

7 A. My declaration.

8 Q. What I'm going to do is I'm going to
9 put in the chat another document, and we are
10 going to look at these concurrently, if you
11 don't mind. So I'm going to drop this now into
12 the chat.

13 If everyone can just let me know when
14 you've accessed it and are able to view it.
15 The file name starts -00757.

16 A. 0057?

17 Q. You have that document open in front
18 of you?

19 A. Yes.

20 MR. BONILLA: Does our court reporter
21 have access to it as well?

22 THE REPORTER: Yes.

1 Q. I'm going to share my screen so we
2 are all looking at the same thing. Give me one
3 moment, because I always forget how I'm
4 supposed to do that.

5 Can you see my screen?

6 A. Yes.

7 Q. You see this document, and at the top
8 it bears United Patent and Trademark Office?

9 A. Yes.

10 Q. And the bottom there's a bolded and
11 underlined portion that says, "Patent Owner
12 Response."

13 A. Yes.

14 Q. I will represent to you that this is
15 the patent owner or CellSpin's response to the
16 petition for inter partes review in IPR
17 2024-00757.

18 Do you see that?

19 A. Yes.

20 Q. It refers to US patent
21 number 8,756,336B2; correct?

22 A. That is right.

1 Q. Do you mind if we refer to this
2 patent as the '336 patent?

3 A. Yes, we can do that.

4 Q. Are you familiar with the '336
5 patent?

6 A. Yes, I am.

7 Q. What does the '336 patent direct to?

8 A. It talks about segmentation at the
9 application layer.

10 Q. Segmentation and the application of
11 data?

12 A. Segmentation done at the application
13 layer.

14 Q. Segmentation done at the application
15 layer. Segmentation of what?

16 A. Segmentation of payload.
17 Segmentation of data. Segmentation of image
18 files.

19 Q. Those three things, payload, data,
20 image files, are those synonymous in your mind?

21 A. No.

22 Q. What's the difference between each of

1 those three things?

2 A. It depends.

3 Q. It depends on what?

4 A. Payload, file is different. File is
5 the intact data but file -- so the data --
6 fragments of file can be data. And what is
7 sent in a package is the payload.

8 Q. And how does payload or data, as you
9 just defined them, differ from image file?

10 A. Image file is made up of data, of
11 course. But it does -- image file has file
12 error, end of file, all of that. Data is just
13 plain payload.

14 Q. So data and payload are synonymous?

15 A. No, no. I didn't say that. I did
16 not mean that, rather. A network packet, the
17 data a network packet carries is called a
18 payload. And a data is split, as in like -- an
19 image file is split into segments of data.

20 (Thereupon, Exhibit 2 was marked for
21 identification.)

22

1 BY MR. BONILLA:

2 Q. Turning to this document, Exhibit 2
3 that is on the screen right now. Have you seen
4 this document before? And if you need me to
5 scroll down, I can do that. Would you like me
6 to?

7 A. Yes, please do.

8 Q. Let me know if you want me to scroll
9 some more, but the question is: Have you seen
10 this document before?

11 A. Yes. I have seen this document.

12 Q. Did you assist in the preparation of
13 this document?

14 A. This is patent owner's response.

15 Q. I will go scroll up to the cover
16 page.

17 A. This is not mine. This is patent
18 owner's response.

19 Q. Correct. Did you assist in the
20 preparation of the patent owner's response?

21 A. No, no, no.

22 Q. You did not?

1 A. No.

2 Q. But you have seen this document
3 before?

4 A. Yeah.

5 Q. You understand this document relies
6 on your declaration in its arguments?

7 A. Yes.

8 Q. I'm going scroll down --
9 (crosstalk)

10 A. -- I think had used this. Yeah.

11 Q. We are going to scroll down to
12 page 11 of the patent owner response. I'm
13 going to highlight this right here. You see
14 the sentence I've highlighted?

15 A. Uh-huh.

16 Q. It reads, "Indeed, Dr. Gajendragad
17 expressly disagrees with the suggestion that
18 the plain and ordinary meaning of along with
19 could include inside."

20 A. Uh-huh.

21 Q. Did I read that correctly?

22 A. Yes. That is right.

1 Q. Do you agree with that statement?

2 A. Yes, I do.

3 Q. Is there anything inaccurate about
4 that statement?

5 A. No. That is in my report.

6 Q. I'm going to scroll us down to page
7 13 of Exhibit 2. And I'm highlighting another
8 sentence. You see that?

9 A. "As confirmed by Dr. Gajendragad, a
10 POSITA would have likewise understood
11 application there to have this defined
12 meaning." Okay.

13 Q. Do you agree with that statement?

14 A. I stand by my report. Can we see
15 that word, what it means.

16 Q. We can in a moment, but that
17 statement, as stated, is there anything,
18 sitting here today as you're looking at it,
19 that is inaccurate about that statement?

20 A. The only thing is Dr., I'm not a
21 doctor. That is the typo. But apart from
22 that, I stand by my report.

1 Q. So the patent owner response refers
2 to you as Dr. Gajendragad four times. You're
3 saying that that is inaccurate?

4 A. I don't have a Ph.D.

5 Q. So you're not a doctor?

6 A. Yes.

7 Q. I should refer to you as Mr.
8 Gajendragad?

9 A. Sure.

10 Q. I'm going to take us back to
11 Exhibit 1. This is your declaration; correct?

12 A. That's a typo.

13 Q. Sorry?

14 A. That is a typo.

15 Q. Oh, the Dr. instead of Mr. is a typo?

16 A. Yeah.

17 Q. You mean typographical error?

18 A. Yes.

19 Q. So we are going to go into your
20 declaration. We were going to come down --
21 sorry, go ahead.

22 A. No. I said, yes. Okay.

1 Q. In paragraph 2, you have the
2 paragraph that starts with, "I am informed and
3 understand that."

4 Do you see that?

5 A. Uh-huh.

6 Q. By whom were you informed?

7 A. By my counsel.

8 Q. Anyone else?

9 A. No other -- none other than my
10 counsel.

11 Q. When you were referring to my
12 counsel, who are you referring to?

13 A. Scott, Rene.

14 Q. Is that Scott Fuller?

15 A. Yes.

16 Q. And Rene Vazquez?

17 A. Rene Vazquez, yes.

18 Q. Anyone else?

19 A. To the best of my knowledge, the only
20 two people.

21 Q. Have you ever spoken to -- you
22 referred earlier to Gurvinder Singh; correct?

1 A. Yes.

2 Q. And you called him Bobby?

3 A. Yes.

4 Q. Would you consider Bobby to be a
5 friend of yours?

6 A. I mean, we were colleagues back in
7 the day. And he reached out to me sometime in
8 the late October.

9 Q. Would you consider Mr. Singh to be a
10 friend today?

11 A. Yeah.

12 Q. Have you ever spoken to Mr. Randall
13 Garteiser?

14 A. Randall Garteiser, maybe. Yeah.

15 Q. When you say "maybe", what are you
16 thinking of?

17 A. On the phone, I think I spoke to him
18 once.

19 Q. He sometimes goes by Randy.

20 A. Yeah.

21 Q. So you have spoken to Randy?

22 A. Yeah.

1 Q. Did you speak to Mr. Garteiser,
2 Mr. Fuller or Mr. Vazquez in preparing your
3 declaration in these proceedings?

4 A. Not in these proceedings, but in my
5 report. Yeah.

6 Q. So we are looking right now at your
7 declaration or your report; correct?

8 A. Uh-huh.

9 Q. And those three gentlemen, you spoke
10 with them in assisting you to prepare this
11 declaration; is that fair?

12 Again, to be clear, I don't want to
13 know what you talked about. I just want to
14 know if you spoke with them in preparing your
15 report.

16 A. Yeah. In preparing my report, I did
17 speak with them.

18 Q. Did you speak with Mr. Singh in
19 preparing your report?

20 A. He was on initially when all the
21 documents were given to me, initially he was on
22 the call as well.

1 Q. Did you rely on Mr. Singh in forming
2 any of your opinions in these proceedings?

3 A. No. These are completely mine.

4 Q. When it says here in paragraph 2, I
5 am informed and understand that, who informed
6 you?

7 A. The counsel, Rene, Scott.

8 Q. Those are your primary contacts?

9 A. Yes.

10 Q. In paragraph 3 -- I'm just scrolling
11 down a little bit here, in Exhibit 1 --
12 paragraph 3 you state, that a true and correct
13 copy of my resume is attached as Exhibit A.

14 Do you see that?

15 A. Yes. Yes.

16 Q. If Exhibit A is not attached to this
17 document, is there any other way we -- by we I
18 mean petitioner -- would be able to access it?

19 A. I mean, these days you have a lot of
20 ways to access it, as in like you have my
21 online profile. You can go --

22 Q. When you say online profile, where

1 would that be located?

2 A. LinkedIn. Yeah.

3 Q. Anywhere else other than LinkedIn?

4 A. Not in this detail about my
5 education, nowhere else.

6 Q. What do you mean by this detail?

7 A. Like where I did my master's, where
8 I'm currently working. What are my expertise.
9 What -- which protocols I worked on. All of
10 those details.

11 Q. All of those details are listed in
12 your resume?

13 A. I think so.

14 Q. And is this resume that is referred
15 to here as Exhibit A, is that the document that
16 you have in front of you right now?

17 A. Yeah.

18 Q. I'm going to continue scrolling down
19 to paragraph 7, which is under a sub-heading,
20 or heading titled, Information Considered.

21 Do you see that?

22 A. Titled 7, in preparing this written

1 report --

2 Q. I mean, on the screen right now you
3 can see paragraphs 7 through 12 in your
4 declaration; correct?

5 A. Yes.

6 Q. And these are the materials that you
7 considered in forming your opinions for this
8 case?

9 A. Yes.

10 Q. Other than what is listed here, is
11 there anything else that you relied on in
12 forming your opinions for these proceedings?

13 A. To the best of my ability, I've
14 listed everything.

15 Q. So if it is not listed here, we are
16 safe to assume you did not consider it in
17 forming your opinions?

18 A. More or less, I think, yeah.

19 Q. What makes you say more or less?

20 A. I have taken great care in listing
21 all the sources that I'm quoting, and all the
22 snippets that I put in my report. I have taken

1 great care to put all the references there,
2 where that is coming from, all of that. So I
3 think this is accurate.

4 Q. In paragraph 11, you note that one of
5 the things you considered is the Court's claim
6 construction procedures and status as have been
7 explained to me by counsel and as discussed
8 below.

9 Do you see that?

10 A. The Court's claim construction
11 procedures and status as have been explained to
12 me by counsel. Yes, I see that. Yes.

13 Q. Other than what they explained to you
14 about the claim construction procedures and
15 status, did you perform any independent
16 analysis of the claim construction procedures
17 and status in this matter?

18 A. Independent -- I looked at some
19 dictionaries and some other sources.

20 Q. What other sources? You said
21 dictionaries and other sources, what other
22 sources?

1 A. I think I should have listed like the
2 Cisco CCNA book. It is there in my report
3 actually. All of those -- all the places where
4 I put the snippets and where I put everything,
5 it's there in my report.

6 Q. So all the other sources, if you
7 relied on it, it is listed in your declaration?

8 A. Yes.

9 Q. If it's not in your declaration, you
10 didn't rely on that?

11 A. Yes. You can say that. Yes.

12 Q. Are you aware that there is a pending
13 district court litigation between CellSpin and
14 the petitioner?

15 A. CellSpin and petitioner, district
16 court litigation, yes, I'm aware of it.

17 Q. Did you review any of the pleadings
18 or filings in that district court litigation in
19 forming your opinions for this case?

20 A. No. I just know that there's
21 something going on. I haven't -- haven't taken
22 any time to do that, to investigate what is

1 that. Yeah.

2 Q. Let's scroll down a little bit to
3 paragraph 14.

4 A. I'm a technical guy.

5 Q. What do you mean by that?

6 A. Like, I'm not -- I like technology.
7 I like to read, keep myself abreast with the
8 latest and -- in the technology. Not so much
9 inclined on the cases.

10 Q. You mean you're not a lawyer?

11 A. Yeah, basically.

12 Q. Okay.

13 A. Yeah, that is the right way to put
14 it, I guess.

15 Q. So in this section that we are
16 looking at right now, it is section three,
17 legal framework. As you said, you're not an
18 attorney. You're not a lawyer. Where did your
19 understanding of the legal framework come from?

20 A. So Scott and Rene, we had a couple of
21 calls, and that's it. Yeah.

22 Q. So counsel explained the legal

1 framework to you?

2 A. Yeah.

3 Q. The portion of this report that says
4 legal framework, is it fair to say you didn't
5 actually draft this yourself?

6 A. I mean, I stand by my report.

7 Q. Let me ask you a more specific
8 question. So in paragraph 14, you have, in the
9 second line of that paragraph, The so-called
10 open quote, pre-AIA, closed quote, versions.

11 Do you see that?

12 A. Uh-huh.

13 Q. What does AIA mean in that context?

14 A. AIA I know is some law changed in 20-
15 -- I had read about it, I think 2014/2013
16 maybe. And so we have to abide by that, yeah.

17 Q. Why?

18 A. Why?

19 MR. VAZQUEZ: I'm going to object as
20 to calling for a legal conclusion here.

21 BY MR. BONILLA:

22 Q. You can still answer, Mr.

1 Gajendragad.

2 A. So I mean, these patents were given
3 to CellSpin a year to 2013. So prior to 2013,
4 the patents were given to CellSpin, so with the
5 priority date of '07. So with that said, I
6 think -- I think it's fair to -- and the law is
7 from 2013. So yeah, I guess, I'm not a lawyer
8 or anything so, yeah.

9 Q. Does the fact that you were informed
10 that you needed to apply the pre-AIA versions
11 of the patent statutes affect your opinions in
12 the case at all?

13 A. No.

14 Q. I'm going to scroll down a little bit
15 to paragraph 17. You see there it says -- I'm
16 going to highlight it. It says, I am informed
17 and understand that a claim is invalid as
18 anticipated.

19 Did I read that correctly?

20 A. Informed and understand that a claim
21 is invalid as anticipated. Okay.

22 Q. Do you understand the petitioner in

1 these three proceedings to be arguing that any
2 claim is invalid as anticipated?

3 A. No.

4 Q. Why is this paragraph in your
5 declaration?

6 A. I mean, I think it is just to make
7 sure I think. So -- so it is in combination
8 with, so it is -- yeah. So 102 does not apply
9 in this AI.

10 Q. So why include a paragraph discussing
11 section 102 or 102?

12 A. Section 102, just to ensure, just to
13 make sure that 102 is not applied here, and 103
14 is applied.

15 Q. So is that why you have included this
16 highlighted sentence, There is no allegation
17 that any asserted claim is allegedly
18 anticipated by any single reference under 35
19 USC Section 102?

20 A. Yes. Yes.

21 Q. We are going to scroll down some
22 more. You see paragraph 22 here on the screen

1 in Exhibit 1?

2 A. Uh-huh.

3 Q. For our court reporter's sanity,
4 please give me a "yes" or "no"?

5 A. Yes. Yes.

6 Q. Thank you.

7 So in paragraph 22 you note that, I
8 am further advised and understand that
9 references may be combined only when there is
10 an established design need or market pressure
11 to solve a problem.

12 Do you see that?

13 A. Yes.

14 Q. What does that mean?

15 MR. VAZQUEZ: Objection. Calls for a
16 legal conclusion.

17 BY MR. BONILLA:

18 Q. You can still answer, Mr.
19 Gajendragad. Mr. Vazquez is going to make
20 objections as we go through on the record.
21 Unless he instructs you not to answer, you do
22 have to answer the question.

1 A. Only when there is established design
2 need or market pressure to solve a problem. It
3 is kind of self-explanatory. It's what it
4 means.

5 Q. Well, the next clause says, And there
6 are a finite number of identified predictable
7 solutions, and which are easily traversed.

8 Do you see that?

9 A. Uh-huh, I see that.

10 Q. What does that mean?

11 A. Finite number of identified
12 predictable solutions, and which are easily
13 traversed. Like it is self-explanatory.

14 Q. You're saying it means what it says?

15 A. Yes.

16 Q. So is it your understanding that for
17 references to be combined, all three of these
18 clauses must be met?

19 MR. VAZQUEZ: Objection. Calls for a
20 legal conclusion.

21 THE WITNESS: I'm not a lawyer, so...

22 Q. I understand, but you've provided

1 some opinions here about obviousness; correct?

2 A. Yes.

3 Q. And those opinions are based on what
4 you have been advised is the state of the law;
5 correct?

6 A. Yes.

7 Q. I'm just asking if your understanding
8 of the state of the law is that those three
9 things must be met in order for references to
10 be combined for obviousness purposes?

11 MR. VAZQUEZ: Objection. Calls for a
12 legal conclusion.

13 THE WITNESS: Sure.

14 Q. Again, I want to be fair to you.
15 Sure or yes?

16 A. None of the combinations give out a
17 workable solution and does not make it obvious
18 when you're reading through and don't provide
19 alternative workable solution like it's
20 claimed.

21 Q. Mr. Gajendragad, that is not quite
22 the question that I'm asking. Let's make it

1 even more narrow.

2 A. Okay.

3 Q. You see this "and"? "Yes" or "no"?

4 You see the "and"?

5 A. Yes.

6 Q. You see this "and" as well?

7 A. Uh-huh.

8 Q. Sorry, "yes" or "no"?

9 A. Yes, yes, I see the "and".

10 Q. Are those conjunctive or disjunctive?

11 A. Are those conjunctive or disjunctive?

12 Conjunctive. It depends. Conjunctive.

13 Q. These are conjunctive. So all three

14 of these statements that you make, an

15 established design, need or market pressure,

16 finite number of identified predictable

17 solutions, and easily traversed, those three

18 things must exist for one to combine references

19 for purposes of obviousness? Is that your

20 understanding of the state of law?

21 MR. VAZQUEZ: Objection. Calls for a

22 legal conclusion.

1 THE WITNESS: It depends.

2 Q. Depends on what?

3 A. Depends on what we are trying to do,
4 what we are trying to achieve.

5 Q. Well, how about what you're trying to
6 do in including this language in your
7 declaration?

8 A. I stand by my report.

9 Q. So you wrote this sentence that I've
10 highlighted here, the first sentence of
11 paragraph 22? You stand by that statement?

12 A. Yes. Me and my counsel together.
13 Yeah.

14 Q. You and your counsel together.

15 A. Yeah.

16 Q. In this paragraph in the sentence I
17 highlighted -- sorry, go ahead.

18 A. Some of the wordings like language
19 counsel --

20 Q. Some of the language what?

21 A. Counsel helped me write this report.

22 Q. I understand that. You've adopted

1 this sentence that I've highlighted here in
2 paragraph 22 of Exhibit 1. That is a part of
3 your opinion; correct?

4 A. Yes.

5 Q. I just want to know if when you wrote
6 this and adopted it as your opinion, if that
7 means these three things you've identified in
8 this paragraph, in this sentence, are necessary
9 for one to be able to combine references for
10 purposes of obviousness?

11 MR. VAZQUEZ: Objection. Calls for
12 legal conclusion.

13 THE WITNESS: It depends.

14 BY MR. BONILLA:

15 Q. Mr. Gajendragad, you keep saying it
16 depends, but depends on what? Because we
17 are -- I'm looking at -- this your report;
18 correct?

19 A. Right. It depends on the scenario
20 what we are trying --

21 Q. In the scenario of paragraph 22, is
22 the answer, yes, you need all three, or no, you

1 can have one, two or three of them?

2 A. Only when there's established design
3 need or market pressure to solve a problem, and
4 finite (sotto voce) -- in some cases you need
5 all three of them.

6 Q. Are you saying there are some cases
7 where you don't need all three of them?

8 A. Yes.

9 Q. With respect to petitioner's argument
10 in these three proceedings, did you form your
11 opinions believing that all three conditions
12 needed to be met or not?

13 A. Market pressure to solve -- not all.

14 Q. Sorry, not all what?

15 A. Not all of them. Not all of them.
16 Not all three.

17 Q. So in the context of petitioner's
18 obviousness arguments, in these three
19 proceedings --

20 A. Uh-huh.

21 Q. -- and you forming your opinions
22 about those arguments, you did not believe that

1 all three of these conditions must be met in
2 order for references to be combined?

3 MR. VAZQUEZ: Objection.

4 Mischaracterizes prior testimony.

5 THE WITNESS: Can you please repeat
6 the question.

7 Q. Yeah. In the context of petitioner's
8 arguments regarding obviousness in these three
9 proceedings, and you forming your opinions
10 regarding those arguments, is it true that you
11 did not believe that for the references
12 referred to by the petitioner to be combined,
13 they did not have to meet all three of these
14 conditions?

15 MR. VAZQUEZ: Same objection.

16 THE WITNESS: They don't have to meet
17 all three.

18 Q. Okay. And you formed your opinions
19 based on that understanding of this statement?

20 A. Yes.

21 Q. All right. I'm going to scroll down
22 to page 9 of Exhibit 1, paragraphs 27 and 28.

1 We don't have to read through them, but I will
2 represent to you that these two paragraphs
3 relate to the written description requirement
4 of patents in the United States.

5 Do you understand what that is?

6 A. Yes, I do.

7 Q. And do you believe the three patents
8 at issue in these proceedings satisfy the
9 written description requirements of US patent
10 law?

11 A. Yes.

12 MR. VAZQUEZ: Sorry, I'm going to
13 object to that as calling for a legal
14 conclusion.

15 MR. BONILLA: Why?

16 MR. VAZQUEZ: Objection. Calls for
17 legal conclusion.

18 THE WITNESS: Why?

19 BY MR. BONILLA:

20 Q. Why was the answer to my question
21 yes?

22 A. Person who is competent can

1 understand -- understand the return
2 description.

3 Q. Of these three patents?

4 A. Yes.

5 Q. Could you practice the claims of
6 these patents?

7 MR. VAZQUEZ: Objection. Calls for a
8 legal conclusion.

9 THE WITNESS: I think so, yes.

10 BY MR. BONILLA:

11 Q. How?

12 A. You can use the patents and implement
13 what the patent says and try -- implementation
14 is very different, but yeah, we can try that.
15 We can make an attempt.

16 Q. So I don't want to know if you can
17 attempt to implement it. Could you implement
18 inventions as claimed in these three patents?

19 A. Yes.

20 Q. What makes you say that?

21 A. Because the -- I can understand the
22 written description.

1 Q. How?

2 A. Because I'm fairly skilled enough and
3 I qualify as a POSITA.

4 Q. Because you're a person of ordinary
5 skill in the art, you would be able to
6 understand and implement the claimed inventions
7 in these three patents?

8 A. Yes, I think so. Yes.

9 MR. BONILLA: I told you we would
10 take a break about once an hour. How
11 about now for our break?

12 THE WITNESS: Sure.

13 (Thereupon, a brief recess was taken.)

14 BY MR. BONILLA:

15 Q. During our breaks -- we have had two
16 of them -- have you communicated with anybody?

17 A. No.

18 Q. I would like to take us back to
19 Exhibit 1. I'm going to share my screen again.
20 Can you see my screen?

21 A. Yes.

22 Q. So we are here on page 11 of

1 Exhibit 1, and I really want to focus your
2 attention on paragraph 33. Starts with, "It is
3 my understanding." You see that?

4 A. Yes.

5 Q. It says, "It is my understanding that
6 petitioner is seeking to secure narrow
7 constructions of 100 plus claim terms in the
8 district court." Did I read that sentence
9 correctly?

10 A. Yes.

11 Q. Is that accurate as far as reflecting
12 your opinion?

13 A. Yes. That's what I was told.

14 Q. What do you base that statement on?

15 A. I was told that by my counsel.

16 Q. Did you count how many claim terms
17 petitioner is seeking to construe in the
18 district court?

19 A. I don't recall.

20 Q. You don't recall if you counted?

21 A. Yeah.

22 Q. So you might have?

1 A. There were a lot of them.

2 Q. A lot of what?

3 A. A lot of claim terms.

4 Q. How do you know that?

5 A. Like Scott --

6 Q. Hold on, just because I don't want
7 you to tell me what was discussed between you
8 and counsel.

9 MR. VAZQUEZ: I'm going to object to
10 this as testimony, as indicated, you're
11 not -- I'm going to instruct you not to
12 discuss any of the substantive content of
13 the communications between you and
14 counsel. But under those caveats,
15 proceed.

16 BY MR. BONILLA:

17 Q. Let me ask a different question,
18 okay, Mr. Gajendragad?

19 A. Yeah.

20 Q. Other than what you were told by
21 counsel, did you rely on anything else to form
22 the opinion that the petitioner is seeking to

1 secure narrow constructions of 100 plus claim
2 terms?

3 A. I don't recall.

4 Q. Have you seen the allegedly 100 plus
5 claim terms that petitioner is seeking to
6 construe in the district court?

7 A. I may have.

8 Q. But you don't remember?

9 A. Yeah, I don't recall.

10 Q. Is it possible that you formed this
11 opinion based solely on what you were informed
12 by counsel?

13 MR. VAZQUEZ: Objection. Calls for
14 speculation.

15 THE WITNESS: No.

16 BY MR. BONILLA:

17 Q. That is not possible?

18 A. No. I do remember seeing a lot of
19 the claim terms.

20 Q. And you counted those terms?

21 MR. VAZQUEZ: Objection. Asked and
22 answered.

1 THE WITNESS: There were a lot of
2 them.

3 BY MR. BONILLA:

4 Q. Okay. Were there a million of them?

5 A. No.

6 Q. Were there 500 million of them?

7 A. No.

8 Q. Were there 1 million of them?

9 A. No.

10 Q. Were there a thousand of them?

11 A. I mean, it was a ballpark.

12 Q. Is a thousand in the ballpark?

13 A. No.

14 Q. 500?

15 A. No. I think it was about 100 --

16 Q. It was about 100?

17 A. Hundreds.

18 Q. Hundreds. Was it 300?

19 A. It was 100, 110, 95.

20 Q. Sorry, you said 110 or 195?

21 A. I said 110.

22 Q. 110.

1 A. 110, 95. It could be 95.

2 Q. How do you know that?

3 A. In that range.

4 Q. How do you know that?

5 A. How do I know that?

6 Q. You said it was in the range of 95 to
7 110?

8 A. Yes.

9 Q. Something like that?

10 A. Yeah.

11 Q. What are you basing that on?

12 A. To the best of my knowledge, it was
13 around that range.

14 Q. Okay. I understand that to the best
15 of your knowledge that's about how many you
16 think there were. My question to you is, what
17 makes you say that?

18 A. It was in a document.

19 Q. So you reviewed a document and saw
20 that there were somewhere around 95 to 110
21 constructions proposed by the petitioner?

22 A. Yes. I did refer a document. Yeah.

1 I did refer a document.

2 Q. And you counted the terms?

3 A. Again, it is a ballpark --

4 MR. VAZQUEZ: Asked and answered
5 multiple times now.

6 THE WITNESS: Again, it is in the
7 ballpark range. Not the exact number.

8 BY MR. BONILLA:

9 Q. Did you take into consideration
10 whether some claim terms might have appeared in
11 multiple claims of the asserted patents?

12 A. Yes.

13 Q. And did you count each claim term in
14 each patent claim as a separate proposed
15 construction when you wrote this sentence in
16 paragraph 33?

17 A. Can you repeat.

18 Q. Yes. If the claim term had a
19 proposed construction by the petitioner in one
20 patent claim, and that term also showed up in
21 another patent claim, did you count that as two
22 constructions or one?

1 A. So it depends. So basically what
2 you're trying to say is if there was a claim
3 term, for example, A, and claim term A again
4 used in another one, did I count them as two or
5 did I then count them as one?

6 Q. Correct.

7 A. Right?

8 Q. Yes. Did you do one or two?

9 A. Actually, I don't recall if I counted
10 it as two or I counted it as one, I don't
11 recall that. There were a lot of claim terms,
12 that much I know. But I don't know if I -- if
13 I saw there were repetitions or there were
14 duplicates.

15 Q. You understand that between the
16 petitioner in this matter filed IPR petitions
17 on seven patents; correct?

18 A. Yes, in total, yes.

19 Q. This declaration is referring to
20 three of the seven; correct?

21 A. Yes.

22 Q. When you say 100 plus claim terms

1 were proposed for construction by the
2 petitioner, is that the three patents in these
3 proceedings or all seven patents?

4 A. All seven.

5 Q. How many claim terms did the
6 petitioner propose constructions for in the
7 three patents that you're referring to in this
8 declaration?

9 A. I think it is there in my report
10 here. I have to look.

11 Q. You mentioned to me that you have
12 your report in front of you; right?

13 A. Right.

14 Q. Go ahead and you can tell me -- you
15 can direct me on the screen, and I will scroll
16 wherever you would like, or you can look at
17 your report yourself, and then tell me the
18 answer, how many of these claim -- 100 plus
19 claim terms you identified in paragraph 33 are
20 from the three patents that we are talking
21 about here today?

22 A. I know the claim terms. So it's --

1 it is in the -- I mean, you have it there at
2 41, 42, 43 disclosures.

3 Can you repeat the question again.

4 Q. How many of the 100 plus claim terms
5 that you referred to in paragraph 33 are from
6 the three patents that this declaration relates
7 to?

8 A. This declaration, you have to look at
9 it -- can you show it, the disclosures?

10 Q. Are you unable to tell me the answer
11 to my question without looking at the
12 disclosures?

13 A. Yes. I would like to see the
14 disclosures.

15 Q. Without seeing the disclosures, you
16 can't answer my question?

17 A. It is -- it's not a memory.

18 Q. No, and I'm not trying to make it a
19 memory test, if that's what you need, but I
20 need to know the answer to my question, which
21 is, do you need to see the disclosures to
22 answer my question?

1 A. Yes.

2 Q. You do. Okay.

3 Did counsel inform you of this
4 contention in paragraph 33? And to be clear,
5 the answer to this question is "yes" or "no".

6 A. Yes.

7 Q. Did you independently verify that?

8 A. Yes.

9 Q. You did count the terms?

10 A. Yes.

11 Q. But without looking at the
12 disclosures, you don't know how many of those
13 terms are from these three patents as opposed
14 to the other four?

15 A. I don't recall the exact number,
16 yeah.

17 Q. Ballpark it for me, please. Is it
18 more than half?

19 A. I don't want to speculate. I don't
20 want to speculate.

21 Q. Were 99 terms from one set of patents
22 and a few others from the other?

1 MR. VAZQUEZ: Objection. Asked and
2 answered.

3 THE WITNESS: I don't want to
4 speculate.

5 Q. Now that we've confirmed that you did
6 count the terms, can you tell me now if when
7 you saw a term that was used across multiple
8 asserted claims, if you counted that multiple
9 times or as just one term?

10 MR. VAZQUEZ: Objection. Asked and
11 answered.

12 THE WITNESS: I would have to look at
13 the disclosures again, Mr. Bonilla.

14 BY MR. BONILLA:

15 Q. Would it surprise you if I said that
16 there are 16 independent claim terms that were
17 proposed for construction by the petitioner?

18 MR. VAZQUEZ: I'm going to object as
19 to argumentative.

20 THE WITNESS: I would need to look at
21 the disclosures.

22

1 BY MR. BONILLA:

2 Q. When I said that just now, did it
3 surprise you?

4 MR. VAZQUEZ: Objection.
5 Argumentative.

6 THE WITNESS: I don't want to
7 speculate.

8 BY MR. BONILLA:

9 Q. I'm not asking you to speculate, Mr.
10 Gajendragad. I'm asking you, when I said 16,
11 that number, when I said it, did that surprise
12 you or did it not surprise you?

13 A. I recollect seeing a lot of them,
14 so...

15 Q. So it did not surprise you?

16 A. I recollect it being more than 16.

17 Q. So it did surprise you?

18 MR. VAZQUEZ: Objection,
19 mischaracterizes prior testimony.

20 THE WITNESS: I don't want to say a
21 number. I don't want to say --

22

1 BY MR. BONILLA:

2 Q. Mr. Gajendragad, I'm not asking you
3 for a number. When you heard me say 16 terms,
4 did you find yourself in a state of surprise or
5 not?

6 A. I'm trying to recollect how many I
7 saw.

8 Q. Mr. Gajendragad, you know what the
9 word surprise means, yes?

10 A. Yes, sir, I know.

11 Q. Do you feel surprised right now?

12 A. There were definitely more than 16 is
13 what I recall. And because in my mind I see it
14 as more than 16, it is like -- it doesn't
15 surprise me so much.

16 Q. So it does not surprise you?

17 A. It's like 16 is still more than what
18 TikTok wanted to construe in the PTAB, so...

19 Q. So you are surprised by the number 16
20 or you're not surprised by the number 16?

21 MR. VAZQUEZ: Objection. Asked and
22 answered.

1 THE WITNESS: I have to look at the
2 disclosures to see -- to answer that.

3 BY MR. BONILLA:

4 Q. To answer whether you're surprised by
5 the number 16?

6 A. In my recollection, I see that it was
7 more than 16. And that is where my surprise
8 and not being surprised, I'm basing that on.
9 In my recollection, there were a lot of claim
10 terms.

11 Q. Do you think 16 is a lot?

12 A. Yeah.

13 Q. Sixteen is a lot? Okay.

14 A. Yeah. More than what TikTok wanted
15 to construe in PTAB.

16 Q. We're real close to being done here,
17 Mr. Gajendragad, but I really need an answer
18 whether you felt surprised or feel surprised if
19 I tell you there are 16 independent claim terms
20 being proposed by the petitioner across all
21 seven patents in this matter?

22 MR. VAZQUEZ: Objection. Asked and

1 answered.

2 THE WITNESS: Sixteen is still more
3 than what TikTok wants to construe.

4 BY MR. BONILLA:

5 Q. I understand that, sir, but my
6 question to you is, would it surprise you if
7 the number is 16 independent claim terms? Yes,
8 it would surprise me; no, it would not surprise
9 me?

10 A. I don't have an opinion on my emotion
11 at this point in time. Surprise versus not
12 surprised.

13 Q. You can't tell me whether you are
14 surprised or not; right?

15 A. Yes.

16 Q. So let's shift gears a little bit.
17 We are going to go to Exhibit 2, which is the
18 patent owner's response. And we are going to
19 go to page 29 in the PDF, which is page 23 of
20 the document.

21 Do you see what I have highlighted
22 here down here, it starts with "finally"?

1 A. Yeah.

2 Q. I'm going to read this highlighted
3 sentence to you. Just follow along with me.
4 It reads, "Finally, as of 2007, a POSITA would
5 have understood that HTTP was only being used
6 between web servers and requesting browsers,
7 not by standalone mobile applications." Did I
8 read that correctly?

9 A. Yes.

10 Q. And you see how it refers to your
11 declaration at paragraph 67?

12 A. Yes.

13 Q. So let's go to your declaration
14 that's Exhibit 1. You see here how we have
15 paragraph 67?

16 A. Yes.

17 Q. It says in paragraph 67 of Exhibit 1,
18 "As of 2007, a POSITA would have understood
19 that HTTP was only being used between web
20 servers and requesting browsers, not by
21 standalone mobile applications."

22 Did I read that correctly?

1 A. Yes, you read that correctly.

2 Q. Other than the word "finally" -- this
3 is now Exhibit 2, the patent owner response --
4 is the rest of what I've highlighted here in
5 the patent owner response, the rest of that
6 sentence, is that exactly the same as what I
7 have highlighted here in Exhibit 1?

8 A. Yes.

9 Q. What is the basis for your opinion at
10 paragraph 67 of your declaration here in
11 Exhibit 1?

12 A. Give me a second to process my
13 thoughts and answer that.

14 Q. Please take your time.

15 A. So back in 2007, I had not seen any
16 implementation of HTTP protocol being used
17 other than in a browser, in a proper browser.

18 Q. What do you mean by proper browser?

19 A. Like not a browser on a mobile phone
20 or something. Proper, like a laptop or
21 desktop. Browser. Internet -- back in the day
22 Internet Explorer, Mozilla.

1 Q. A full standalone web browser?

2 A. Yes.

3 Q. Not the mobile version of a web
4 browser?

5 A. Yes.

6 Q. You had personally not seen -- sorry,
7 go ahead.

8 A. Back in 2007, there were other
9 protocols that mobile phones would engage in,
10 like WAP protocol and things like that.

11 Q. What other protocols besides WAP?

12 A. I have to look, but WAP protocol was
13 being pushed by the industry. There were like
14 big books on WAP. WAP itself is a complete
15 stack. So it has a transport and all that,
16 yeah.

17 Q. Any other protocols?

18 A. WMTp is part of WAP. So WMTp comes
19 in the transport layer. So that was
20 architecture back in the day. That is what
21 was, like, giving training on in a lot of these
22 software companies.

1 Q. Other than your personal knowledge,
2 as of 2007, is this statement in paragraph 67
3 of your declaration Exhibit 1 to this
4 deposition, based on anything else?

5 A. No. Rephrase your question. As of
6 2007?

7 Q. I want to explore, I want to know
8 everything you relied on to make that statement
9 that isn't your personal knowledge, education
10 and training. Is there anything else?

11 A. No. Like I referred to -- I recall
12 the technologies that were there in 2007, what
13 was the norm back then.

14 Q. Your opinion -- your opinion here is
15 based on your recollection of the state of the
16 art back then?

17 A. Yes. Yeah. So back in the day there
18 was companies training on WAP architecture
19 because it was very new back in the day, and
20 mobile phones didn't have a full-fledged color
21 screen back in the day.

22 Q. I'm going to stop sharing my screen.

1 A. Blueberry [sic] was probably the
2 only -- Blueberry phone, Blueberry, that was
3 probably the only phone that had a browser back
4 then.

5 MR. BONILLA: So can we go off the
6 record, please.

7 (Thereupon, a brief recess was taken.)

8 BY MR. BONILLA:

9 Q. Mr. Gajendragad, how much time would
10 you say you spent drafting this declaration,
11 Exhibit 1, in this deposition?

12 A. I don't recall exactly. I don't
13 recall exactly. I cannot quote a number on it.

14 Q. Was it a million hours?

15 A. Not like that. It was not like a one
16 day I sat and wrote the whole thing.

17 Q. Was it 50, 100, 150, 200 hours?
18 About how much time did you spend?

19 A. About 150, 200 hours.

20 MR. BONILLA: Okay. I have no
21 further questions at this time. I pass
22 the witness.

1 MR. VAZQUEZ: Thank you. I just have
2 -- I have a little bit of redirect here.
3 Won't take long.

4 FURTHER EXAMINATION

5 BY MR. VAZQUEZ:

6 Q. So Mr. Gajendragad, I want to revisit
7 the section of your declaration regarding legal
8 framework. And I just want to just confirm,
9 you're obviously not an attorney; right?

10 A. Yes.

11 Q. You did rely on counsel for
12 information related to, for example, the
13 pre-AIA versions of patent statutes?

14 A. Yes. That is right.

15 Q. And I want to specifically go to
16 address paragraph 33 of your declaration, which
17 was the paragraph involving the 100 plus claim
18 terms that -- quoting to your paragraph 33.

19 A. Yes.

20 Q. So I want to lay a little bit of
21 foundation here, because as you know, there
22 were seven patents in total; right, involved in

1 the IPRs?

2 A. Right.

3 Q. So I want to clarify, you understand
4 that a claim term, such as claim term A, can
5 appear in multiple claims across multiple
6 patents? Do you understand that?

7 A. Yes, I understand.

8 Q. So it's possible that a particular
9 claim term, for example, could appear in all
10 seven patents, in multiple claims, and within
11 those seven patents, do you agree with that?

12 A. Yes, I agree.

13 Q. So in your recollection when this
14 particular statement in paragraph 33, seeking
15 to secure narrow constructions of 100 plus
16 claim terms, do you know, as you consider what
17 I just said, in terms of how claim terms can
18 appear in multiple claims, do you feel that
19 those 100 plus -- that number 100 plus could be
20 a particular claim term being addressed in
21 multiple claims over multiple patents?

22 A. Yes, I understand -- yes, I agree.

1 MR. VAZQUEZ: Okay, so I just wanted
2 to clarify that.

3 That is really all I have. I wanted
4 to clarify that point.

5 MR. BONILLA: Counsel, if I may, I
6 have -- I can't say I have one question,
7 because it always turns into more than
8 one.

9 FURTHER EXAMINATION

10 BY MR. BONILLA:

11 Q. During the break we just took from
12 1:09 Pacific to 1:15 Pacific, did you
13 communicate with anyone?

14 A. No.

15 MR. BONILLA: No further questions.
16 (Time Noted: 4:21 p.m.)
17
18
19
20
21
22

1 CERTIFICATE

2
3 I, the undersigned authority, hereby
4 certify that the foregoing transcript, page 1
5 through 90 is a true and correct transcription
6 of the deposition of PAVAN M. GAJENDRAGAD,
7 taken before me at the time and place set forth
8 on the title page hereof.

9 I further certify that said witness
10 was duly sworn by me according to law.

11 I further certify that I am not of
12 counsel to any of the parties to said cause or
13 otherwise interested in the event thereof.

14 IN WITNESS WHEREOF I hereunto set my
15 hand and affix official seal this 31st day of
16 March, 2025.

17
18
19 
20

21 RANDI GARCIA, COURT REPORTER, RPR

22 NOTARY PUBLIC

1 Pavan M. Gajenragad, c/o

2 Garteiser Honea

3 119 West Ferguson

4 Tyler, Texas 75702-7203

5

6 Case: TikTok, Inc. v. CellSpin Soft, Inc.

7 Date of deposition: March 21, 2025

8 Deponent: Pavan M. Gajenragad

9

10 Please be advised that the transcript in the above
11 referenced matter is now complete and ready for signature.

12 The deponent may come to this office to sign the transcript,
13 a copy may be purchased for the witness to review and sign,
14 or the deponent and/or counsel may waive the option of
signing. Please advise us of the option selected.

15 Please forward the errata sheet and the original signed
signature page to counsel noticing the deposition, noting the
16 applicable time period allowed for such by the governing
Rules of Procedure. If you have any questions, please do
17 not hesitate to call our office at (202)-232-0646.

18 Sincerely,

19 Digital Evidence Group

20 Copyright 2025 Digital Evidence Group

21 Copying is forbidden, including electronically, absent
22 express written consent.

1 Digital Evidence Group, L.L.C.
2 1730 M Street, NW, Suite 812
3 Washington, D.C. 20036
4 (202) 232-0646
5

6 SIGNATURE PAGE

7 Case: TikTok, Inc. v. CellSpin Soft, Inc.

8 Witness Name: Pavan M. Gajenragad

9 Deposition Date: March 21, 2025
10

11 I do hereby acknowledge that I have read
12 and examined the foregoing pages
13 of the transcript of my deposition and that:

14 (Check appropriate box):

15 () The same is a true, correct and
16 complete transcription of the answers given by
17 me to the questions therein recorded.

18 () Except for the changes noted in the
19 attached Errata Sheet, the same is a true,
20 correct and complete transcription of the
21 answers given by me to the questions therein
22 recorded.

19 _____
DATE

20

21

22

DATE

WITNESS SIGNATURE

NOTARY

Page 95

1 Digital Evidence Group, LLC
2 1730 M Street, NW, Suite 812
3 Washington, D.C. 20036
4 (202)232-0646
5

6 ERRATA SHEET
7

8 Case: TikTok, Inc. v. CellSpin Soft, Inc.
9 Witness Name: Pavan M. Gajenragad
10 Deposition Date: March 21, 2025

11 Page No. Line No. Change
12
13
14
15
16
17
18
19
20

21 _____

22 Signature

Date

A	AI 57:9	approximately 2:9	bachelor 13:2	boards 23:15,21
A-I-R-V-A-N-A 23:2	AIA 55:13,14	architecture 18:22 86:20	bachelor's 13:18	24:3,3
abide 55:16	airplane 15:4	87:18	32:2	Bobby 11:2,5
ability 51:13	Airvana 22:19	arguing 57:1	back 10:8 32:2	47:2,4
able 38:14 49:18	23:2,3 24:8	argument 36:13	37:8 45:10 47:6	bolded 39:10
63:9 68:5	allegation 57:16	36:18 37:5 64:9	68:18 85:15,21	Bonilla 3:4 4:7,9
above-captioned 2:3	allegedly 57:17	argumentative 79:19 80:5	86:8,20 87:13	6:5 31:6,9 33:3
abreast 54:7	71:4	arguments 43:6	87:16,17,19,21	33:10 38:20
absent 93:21	allowed 93:16	64:18,22 65:8	88:3	42:1 55:21
access 38:21	alternative 60:19	65:10	background 12:8	58:17 63:14
49:18,20	analysis 26:5,6	art 68:5 87:16	ballpark 72:11	66:15,19 67:10
accessed 38:14	26:16 29:9 30:4	asked 10:9 13:22	72:12 74:3,7	68:9,14 70:16
accessible 22:4	52:16	71:21 74:4 79:1	78:17	71:16 72:3 74:8
accurate 36:12	analyzing 29:10	79:10 81:21	Bangalore 12:17	79:13,14 80:1,8
52:3 69:11	29:12	82:22	16:12	81:1 82:3 83:4
achieve 37:7 62:4	and/or 93:14	asking 7:16 29:22	banking 18:5,7,8	88:5,8,20 91:5
achieved 37:7	annotated 14:8	60:7,22 80:9,10	18:13,16,18	91:10,15
acknowledge 94:10	answer 30:21	81:2	base 23:14,16	book 53:2
acquired 29:4	55:22 58:18,21	asserted 57:17	69:14	bookkeeping 22:12
30:8	58:22 63:22	74:11 79:8	based 22:20 60:3	books 86:14
act 10:13	66:20 76:18	assist 42:12,19	65:19 71:11	bottle 14:13
address 89:16	77:10,16,20,22	assisting 28:13	87:4,15	bottom 39:10
addressed 90:20	78:5 82:2,4,17	28:14 48:10	basically 23:13	box 94:12
administrator 21:3	85:13	associated 18:19	27:12 36:9	break 30:16,19
admit 20:14	answered 71:22	Association 31:21	54:11 75:1	30:22 31:1
adopted 62:22	74:4 79:2,11	assume 51:16	basing 73:11 82:8	68:10,11 91:11
63:6	81:22 83:1	attached 49:13	basis 85:9	breakfast 8:8
ads 27:13	answers 94:13,16	49:16 94:15	bears 33:16 39:8	breaks 68:15
AdTech 25:22	anticipated 56:18	attempt 67:15,17	beds 17:8	brief 28:15 31:8
27:10,12 29:13	56:21 57:2,18	attend 13:12	behalf 6:22	68:13 88:7
advise 93:14	anybody 68:16	attended 13:14	believe 7:19	Broadband 25:6
advised 58:8 60:4	apart 44:21	attention 69:2	64:22 65:11	browser 85:17,17
93:10	APPEAL 1:2	attorney 7:11,12	66:7	85:18,19,21
Affair 16:11,12	appear 90:5,9,18	7:13 54:18 89:9	believing 64:11	86:1,4 88:3
affect 56:11	appeared 74:10	August 17:17,21	best 46:19 51:13	browsers 84:6,20
affix 92:15	applicable 93:16	20:20 21:13	73:12,14	BS 12:20 13:1
ago 9:10 28:7	application 14:19	authority 92:3	big 86:14	
agree 44:1,13	18:11 40:9,10	aware 32:12	bit 18:12 35:2	C
90:11,12,22	40:12,14 44:11	53:12,16	49:11 54:2	C 3:1
ahead 32:15	applications 14:20 84:7,21		56:14 83:16	c/o 93:1
45:21 62:17	applied 32:17		89:2,20	call 35:22 48:22
76:14 86:7	57:13,14		Blueberry 88:1,2	93:17
	apply 56:10 57:8		88:2	called 2:2 16:16
	appreciate 36:5	B	Bluetooth 16:17	41:17 47:2
	appropriate 94:12	B 17:2	16:19 19:10	calling 55:20
		B2 1:11,12	24:19 25:2	66:13
			BOARD 1:2	

calls 54:21 58:15 59:19 60:11 61:21 63:11 66:16 67:7 71:13 capacity 23:17,19 care 51:20 52:1 Caritor 21:16 carries 41:17 case 51:8 53:19 56:12 93:6 94:7 95:8 cases 19:3 54:9 64:4,6 cause 92:12 caveats 70:14 CCNA 53:2 cell 15:1 CellSpin 1:7 7:1 7:7 9:11,14 11:1 37:7 53:13 53:15 56:3,4 93:6 94:7 95:8 CellSpin's 11:16 39:15 center 21:4 CEO 9:13 certain 22:9 Certainly 30:18 CERTIFICATE 92:1 certification 26:13,13,17,17 certifications 26:12,15 28:12 certify 92:4,9,11 Change 95:11 changed 55:14 changes 94:14 chat 32:21 38:9 38:12 check 17:4 94:12 checking 15:5 Chelmsford 22:20 Cinarra 29:3,5 30:1,6,7	circuit 19:5 Cisco 53:2 Civil 2:5 claim 52:5,10,14 52:16 56:17,20 57:2,17 69:7,16 70:3 71:1,5,19 74:10,13,14,18 74:20,21 75:2,3 75:11,22 76:5 76:18,19,22 77:4 79:16 82:9 82:19 83:7 89:17 90:4,4,9 90:16,17,20 claimed 60:20 67:18 68:6 claims 67:5 74:11 79:8 90:5,10,18 90:21 clarify 90:3 91:2 91:4 clause 59:5 clauses 59:18 cleaning 26:5,17 clear 35:17 48:12 78:4 ClearQuest 22:15 client 18:22 19:2 19:13 close 15:14,15 82:16 close-range 16:20 closed 19:5 55:10 colleagues 47:6 College 13:11 color 87:20 combination 57:7 combinations 60:16 combine 61:18 63:9 combined 37:6 58:9 59:17 60:10 65:2,12 combining 37:18 come 35:4 45:20	54:19 93:12 comes 86:18 coming 27:2 52:2 commencing 2:8 communicate 91:13 communicated 68:16 communication 16:5,21 17:9 19:1,6,12,14 24:18 communications 24:18 70:13 commute 15:22 companies 86:22 87:18 company 16:13 17:20 23:1,22 competent 66:22 complete 86:14 93:11 94:13,15 completely 49:3 computer 14:21 conclusion 55:20 58:16 59:20 60:12 61:22 63:12 66:14,17 67:8 concurrently 38:10 conditions 64:11 65:1,14 confirm 89:8 confirmed 9:6 44:9 79:5 conjunctive 61:10,11,12,12 61:13 consent 93:22 consider 47:4,9 51:16 90:16 consideration 74:9 considered 50:20 51:7 52:5 construction 52:6	52:10,14,16 74:15,19 76:1 79:17 constructions 69:7 71:1 73:21 74:22 76:6 90:15 construe 69:17 71:6 81:18 82:15 83:3 contacted 10:3,6 10:22 11:2 contacts 49:8 content 70:12 contention 78:4 context 55:13 64:17 65:7 continue 50:18 conversing 14:19 copy 49:13 93:13 Copying 93:21 Copyright 93:20 correct 7:2 10:14 33:21 34:14 39:21 42:19 45:11 46:22 48:7 49:12 51:4 60:1,5 63:3,18 75:6,17,20 92:5 94:13,15 correctly 43:21 56:19 69:9 84:8 84:22 85:1 counsel 3:2,14 11:3,4 35:1,6 35:18 46:7,10 46:12 49:7 52:7 52:12 54:22 62:12,14,19,21 69:15 70:8,14 70:21 71:12 78:3 89:11 91:5 92:12 93:14,15 counsel's 35:22 counseling 21:4 count 69:16 74:13,21 75:4,5	78:9 79:6 counted 69:20 71:20 74:2 75:9 75:10 79:8 couple 26:7,10 31:4 54:20 course 41:11 court 33:10 38:20 53:13,16,18 58:3 69:8,18 71:6 92:21 Court's 52:5,10 cover 42:15 created 35:20 crosstalk 43:9 cup 14:15 currently 31:17 50:8
D				
D 4:1 6:1,1 D.C 1:21 94:3 95:3 Dallas 3:7 data 25:21 26:2,4 26:4,5,5,6,16 26:17 27:13 29:8,10,12,13 29:13,14,15 40:11,17,19 41:5,5,6,8,10 41:12,14,17,18 41:19 database 29:14 date 56:5 93:7 94:9,19,22 95:10,22 day 18:18 47:7 85:21 86:20 87:17,19,21 88:16 92:15 days 9:10 49:19 December 25:17 25:18,19 28:21 declaration 5:6 7:7,18 33:17,19 34:8,13 38:6,7				

43:6 45:11,20 48:3,7,11 51:4 53:7,9 57:5 62:7 75:19 76:8 77:6,8 84:11,13 85:10 87:3 88:10 89:7,16 deeper 18:17 defined 41:9 44:11 definitely 81:12 degree 13:1,16,19 21:12 degrees 13:4,20 deliverables 20:9 depends 29:19 41:2,3 61:12 62:1,2,3 63:13 63:16,16,19 75:1 deponent 93:8,12 93:14 deposed 6:10 deposition 1:15 2:1,4 8:5,18,21 31:2 87:4 88:11 92:6 93:7,15 94:9,11 95:10 description 5:3 66:3,9 67:2,22 design 19:3 29:17 30:4 58:10 59:1 61:15 64:2 designing 24:3 29:21 desktop 85:21 detail 50:4,6 details 37:2 50:10 50:11 developer 21:6 development 20:11 device 16:22 dictionaries 52:19,21 Diego 24:11 differ 41:9	difference 40:22 different 17:7 37:6 41:4 67:14 70:17 Digital 1:20 93:19,20 94:1 95:1 direct 40:7 76:15 disagrees 43:17 disclosures 77:2 77:9,12,14,15 77:21 78:12 79:13,21 82:2 discuss 70:12 discussed 28:15 52:7 70:7 discussing 57:10 disjunctive 61:10 61:11 display 27:13 district 53:13,15 53:18 69:8,18 71:6 disturbed 15:5 doctor 44:21 45:5 document 33:13 33:16 34:1,4,17 34:20 35:4,9 38:9,17 39:7 42:2,4,10,11,13 43:2,5 49:17 50:15 73:18,19 73:22 74:1 83:20 documentations 22:7 documents 22:3 22:9,10 48:21 doing 6:19 28:9 30:17 32:2 Dr 43:16 44:9,20 45:2,15 draft 35:9,11,12 35:14,15,19 55:5 drafting 88:10 drawn 14:9	Drive 15:11 drop 32:21 38:11 duly 6:2 92:10 duplicates 75:14 E E 3:1,1 4:1 6:1 earlier 46:22 easily 22:4 59:7 59:12 61:17 education 12:18 13:6 50:5 87:9 eight 19:20 either 11:20 12:2 elaborate 36:5 electronically 93:21 emotion 83:10 employed 12:5 engage 86:9 engineer 16:15 17:13 18:2,3 20:2 22:21 23:5 23:6 24:16 Engineers 31:14 ensure 57:12 entail 22:5 entire 21:7,9 Ericsson 21:17 21:18 22:1 Ericsson's 22:7 errata 93:15 94:15 95:6 error 17:8 41:12 45:17 Esq 3:4,10,16 establish 35:7 established 58:10 59:1 61:15 64:2 EV-DO 23:12 25:1 event 92:13 Evidence 1:20 93:19,20 94:1 95:1 exact 74:7 78:15 exactly 85:6	88:12,13 Examination 2:3 4:5 6:4 89:4 91:9 examined 6:2 94:11 example 75:3 89:12 90:9 execution 30:5 exhibit 5:3,5,8 33:1,4,5,13,15 41:20 42:2 44:7 45:11 49:11,13 49:16 50:15 58:1 63:2 65:22 68:19 69:1 83:17 84:14,17 85:3,7,11 87:3 88:11 exhibits 5:1 32:22 exist 61:18 existence 27:15 experience 16:10 26:2 expert 6:21,22 10:13,16,20 expertise 25:20 50:8 explain 26:21 31:12 explained 52:7,11 52:13 54:22 exploratory 26:6 26:16 explore 87:7 Explorer 85:22 express 93:22 expressly 43:17 F fact 56:9 fair 19:15 34:16 37:11 48:11 55:4 56:6 60:14 fairly 68:2 familiar 40:4	far 69:11 Federal 2:5 feel 81:11 82:18 90:18 felt 82:18 Ferguson 3:17 93:3 field 27:8 fields 27:2 file 17:3,5,5,6 33:20 38:15 41:4,4,5,6,9,10 41:11,11,12,19 filed 75:16 files 16:22 40:18 40:20 filings 53:18 Final 5:5 33:18 finally 83:22 84:4 85:2 find 81:4 fine 35:7 finished 20:10 finite 59:6,11 61:16 64:4 first 6:2 10:6,19 16:10 17:10 31:2 32:21 34:10 35:9,11 35:12,14,15,20 62:10 Fish 3:3,9 five 30:16 focus 19:15,16 28:17 29:17 69:1 folder 22:12 follow 84:3 follows 6:3 forbidden 93:21 foregoing 92:4 94:11 forget 39:3 form 64:10 70:21 formed 65:18 71:10 forming 49:1
--	--	---	---	--

51:7,12,17 53:19 64:21 65:9 forth 36:18 92:7 forward 93:15 foundation 89:21 four 28:15 45:2 78:14 fragments 41:6 framework 54:17 54:19 55:1,4 89:8 Friday 1:17 2:8 friend 47:5,10 friend's 27:21 28:1,3 front 14:1,6,11 33:14 34:6,10 38:17 50:16 76:12 full 86:1 full-fledged 87:20 Fuller 46:14 48:2 further 12:18 58:8 88:21 89:4 91:9,15 92:9,11	gears 83:16 generally 37:9 gentlemen 48:9 Getting 28:12 give 6:20 18:12 39:2 58:4 60:16 85:12 given 48:21 56:2 56:4 94:13,16 giving 10:10 86:21 glaring 36:17,19 go 18:16 22:8,11 23:15 31:6 32:15 42:15 45:19,21 49:21 58:20 62:17 76:14 83:17,19 84:13 86:7 88:5 89:15 goes 23:16 47:19 going 7:16 8:1 31:3 32:20,21 37:1 38:8,8,10 38:11 39:1 43:8 43:11,13 44:6 45:10,19,20 50:18 53:21 55:19 56:14,16 57:21 58:19 65:21 66:12 68:19 70:9,11 79:18 83:17,18 84:2 87:22 good 6:6 7:12 8:8 33:11 governing 93:16 graduate 12:10 graduated 21:21 great 51:20 52:1 Group 1:20 93:19,20 94:1 95:1 GSM 22:7,11 guess 8:12 54:14 56:7 Gurvinder 9:16	46:22 guy 54:4 H H 3:10 half 8:16 78:18 hand 92:15 happens 19:1 hardware 19:16 19:18 headed 26:8 heading 50:20 heard 81:3 held 27:1 help 38:1 helped 35:1 62:21 hereof 92:8 hereunto 92:14 hesitate 93:17 high 12:10,13,19 highlight 43:13 56:16 highlighted 43:14 57:16 62:10,17 63:1 83:21 84:2 85:4,7 highlighting 44:7 hired 17:10 hold 32:6 70:6 home 15:20 Honea 3:15 93:2 hope 32:22 hour 8:15,16 30:16 68:10 hours 88:14,17 88:19 HTTP 84:5,19 85:16 Hundreds 72:17 72:18 I identification 33:2 41:21 identified 59:6,11 61:16 63:7	76:19 image 40:17,20 41:9,10,11,19 implement 67:12 67:17,17 68:6 implementation 18:21 29:18 30:5 37:2 67:13 85:16 improve 28:17 improving 28:19 inaccurate 44:3 44:19 45:3 inclined 54:9 include 43:19 57:10 included 57:15 including 24:18 62:6 93:21 Incorporated 7:1 incorrect 27:7 independent 52:15,18 79:16 82:19 83:7 independently 78:7 INDEX 5:1 India 12:15,16,17 12:22 26:8,19 indicated 70:10 indicating 14:7 individuals 11:21 industry 86:13 inform 78:3 information 50:20 89:12 informed 46:2,6 49:5,5 56:9,16 56:20 71:11 Infosys 17:19 18:1 19:7,11,17 19:20 20:1,13 initially 11:2 48:20,21 inside 43:19 Institute 12:21 institution 13:10	instruct 70:11 instructs 58:21 instrumentation 12:20 31:21 intact 41:5 inter 36:3,7,16 39:16 interested 92:13 intern 21:18 internal 22:3 International 31:14 interned 21:17 Internet 85:21,22 internship 21:22 22:16 interrupt 24:20 intuitive 22:10 invalid 56:17,21 57:2 invalidate 36:12 invalidation 36:11 inventions 67:18 68:6 inventor 32:13 inventors 11:15 11:19 invested 26:7,9 investigate 53:22 invite 9:6 involved 29:20 29:21 89:22 involving 89:17 IPR 34:9,18 39:16 75:16 IPR2024-007 1:12 IPR2024-00757 1:10 IPR2024-00759 1:11 IPRs 90:1 IRC 31:15 ISA 31:20 issue 66:8
---	---	---	--	---

J	36:21 late 47:8 latest 54:8 Laviano 11:13,14 law 55:14 56:6 60:4,8 61:20 66:10 92:10 lawyer 54:10,18 56:7 59:21 lay 89:20 layer 40:9,13,15 86:19 lead 20:2 leadership 32:6 learned 22:14 learning 26:5 leave 20:13 legal 54:17,19,22 55:4,20 58:16 59:20 60:12 61:22 63:12 66:13,17 67:8 89:7 let's 31:6 54:2 60:22 83:16 84:13 Leung 3:10 likewise 44:10 limited 7:19 24:19 line 37:19 55:9 95:11 LinkedIn 50:2,3 list 24:21 listed 11:18 32:12 34:9 50:11 51:10,14,15 53:1,7 listing 51:20 litigation 53:13 53:16,18 little 16:9 18:12 18:17 35:1 49:11 54:2 56:14 83:16 89:2,20 live 15:16,17	LLC 95:1 located 15:7 50:1 location 29:15 long 8:13 17:16 19:19 20:18 24:4 25:16 27:17 28:7,9,18 30:6 89:3 look 27:1 38:10 76:10,16 77:8 79:12,20 82:1 86:12 looked 52:18 looking 39:2 44:18 48:6 54:16 63:17 77:11 78:11 lost 27:22 lot 22:6 35:16 49:19 70:1,2,3 71:18 72:1 75:11 80:13 82:9,11,13 86:21 LTE 25:1	20:15,22 21:5 Massachusetts 22:20 master's 13:6,7 13:15,19 20:17 20:18 50:7 materials 51:6 matter 2:3 10:3,7 11:1 52:17 75:16 82:21 93:11 mean 9:5 16:18 20:6 26:3,10 27:5,11 35:1 36:22 37:12 38:5 41:16 45:17 47:6 49:18,19 50:6 51:2 54:5,10 55:6,13 56:2 57:6 58:14 59:10 72:11 77:1 85:18 meaning 43:18 44:12 means 16:6 44:15 59:4,14 63:7 81:9 meet 8:17 65:13 65:16 meetings 20:8 member 31:10,18 31:20,22 32:8,9 memory 77:17,19 mentioned 26:19 76:11 met 59:18 60:9 64:12 65:1 Metro 15:11 million 72:4,6,8 88:14 mind 38:11 40:1 40:20 81:13 mine 34:7 42:17 49:3 Minneapolis 3:12 minutes 30:16	31:3,4,7 mischaracterizes 65:4 80:19 Mistral 16:11,12 16:14 17:11,14 19:18 MN 3:12 mobile 25:6 27:13 84:7,21 85:19 86:3,9 87:20 mobile-to-mobile 16:21 mode 15:4 moment 15:8 37:14 39:3 44:16 monetization 25:21 money 18:19 months 19:20,21 morning 6:6 9:5 9:8 Mozilla 85:22 multiple 74:5,11 79:7,8 90:5,5 90:10,18,21,21
K	55:4,20 58:16 59:20 60:12 61:22 63:12 66:13,17 67:8 89:7 let's 31:6 54:2 60:22 83:16 84:13 Leung 3:10 likewise 44:10 limited 7:19 24:19 line 37:19 55:9 95:11 LinkedIn 50:2,3 list 24:21 listed 11:18 32:12 34:9 50:11 51:10,14,15 53:1,7 listing 51:20 litigation 53:13 53:16,18 little 16:9 18:12 18:17 35:1 49:11 54:2 56:14 83:16 89:2,20 live 15:16,17	M M 1:16,21 2:2 4:3 92:6 93:1,8 94:2,8 95:2,9 M-I-S-T-R-A-L 16:12 machine 26:5 Main 3:5 making 29:14 management 13:9 March 1:17 2:8 29:6 92:16 93:7 94:9 95:10 Marcos 11:8,10 marked 33:1 41:20 market 58:10 59:2 61:15 64:3 64:13 Maryland 13:11	51:2 54:5,10 55:6,13 56:2 57:6 58:14 59:10 72:11 77:1 85:18 meaning 43:18 44:12 means 16:6 44:15 59:4,14 63:7 81:9 meet 8:17 65:13 65:16 meetings 20:8 member 31:10,18 31:20,22 32:8,9 memory 77:17,19 mentioned 26:19 76:11 met 59:18 60:9 64:12 65:1 Metro 15:11 million 72:4,6,8 88:14 mind 38:11 40:1 40:20 81:13 mine 34:7 42:17 49:3 Minneapolis 3:12 minutes 30:16	N N 3:1 4:1 6:1,1 name 6:7 23:1 27:4 28:1,3,5 38:15 94:8 95:9 narrow 61:1 69:6 71:1 90:15 nearby 19:6 necessary 63:8 need 42:4 58:10 59:2 61:15 63:22 64:3,4,7 77:19,20,21 79:20 82:17 needed 56:10 64:12 network 21:3 22:7,11 41:16 41:17
L				
L.L.C 94:1 language 35:8 62:6,18,20 laptop 85:20 Largely 34:21				

networking 18:21	47:8	original 93:15	90:14,20	personally 11:21
new 27:1,2 87:19	October/Nove... 10:9	owner 1:8 3:14	parties 92:12	86:6
night 8:12	office 1:1 15:12	7:4 38:2,6	pass 88:21	pertaining 22:10
norm 87:13	15:14,15,19	39:11,15 43:12	patent 1:1,2,8,10	petition 39:16
Notary 2:7 92:22	39:8 93:12,17	45:1 85:3,5	1:11,12 3:14	petitioner 1:5 3:2
94:22	official 92:15	owner's 37:20	5:8 7:4 11:16	7:13 36:18
note 52:4 58:7	Oh 21:16 30:7	42:14,18,20	32:18 36:12	49:18 53:14,15
noted 91:16	45:15	83:18	37:20 38:2,5	56:22 65:12
94:14	okay 7:15 8:2		39:8,11,15,20	69:6,17 70:22
notes 14:10 35:12	10:11 12:8 14:4	P	40:2,2,5,7	71:5 73:21
35:16,16	27:8 44:12	P 3:1,1 6:1	42:14,17,20	74:19 75:16
noticed 14:1	45:22 54:12	P-A-V-A-N 6:8	43:12 45:1	76:2,6 79:17
noticing 93:15	56:21 61:2	P.C 3:3,9	56:11 66:9	82:20
noting 93:15	65:18 70:18	p.m 2:9 91:16	67:13 74:14,20	petitioner's 64:9
November 17:22	72:4 73:14 78:2	Pacific 91:12,12	74:21 83:18	64:17 65:7
number 39:21	82:13 88:20	package 41:7	85:3,5 89:13	petitions 75:16
59:6,11 61:16	91:1	packet 41:16,17	patents 7:20	Ph.D 45:4
74:7 78:15	once 17:3 47:18	page 4:5 5:3	11:19 32:13	phone 15:1 27:14
80:11,21 81:3	68:10	34:10 42:16	35:6 36:10 37:6	47:17 85:19
81:19,20 82:5	online 13:13	43:12 44:6	37:18 56:2,4	88:2,3
83:7 88:13	49:21,22	65:22 68:22	66:4,7 67:3,6	phones 86:9
90:19	open 14:21 33:6	83:19,19 92:4,8	67:12,18 68:7	87:20
NW 1:21 94:2	38:17 55:10	93:15 94:6	74:11 75:17	physically 13:12
95:2	opinion 6:21,22	95:11	76:2,3,7,20	13:14 15:7
	63:3,6 69:12	pages 94:11	77:6 78:13,21	23:20
O	70:22 71:11	paid 22:16	82:21 89:22	picture 11:3
object 55:19	83:10 85:9	papers 14:1	90:6,10,11,21	place 15:21 16:1
66:13 70:9	87:14,14	paragraph 46:1,2	Pavan 1:16 2:2	92:7
79:18	opinions 7:20	49:4,10,12	4:3 6:8 33:17	places 53:3
objection 58:15	34:16 49:2 51:7	50:19 52:4 54:3	33:18 92:6 93:1	plain 41:13 43:18
59:19 60:11	51:12,17 53:19	55:8,9 56:15	93:8 94:8 95:9	planning 30:17
61:21 63:11	56:11 60:1,3	57:4,10,22 58:7	payload 40:16,19	plans 24:17
65:3,15 66:16	64:11,21 65:9	62:11,16 63:2,8	41:4,7,8,13,14	pleadings 53:17
67:7 71:13,21	65:18	63:21 69:2	41:18	please 6:6 24:21
79:1,10 80:4,18	opposed 78:13	74:16 76:19	PDF 83:19	33:6 37:16 42:7
81:21 82:22	option 93:14,14	77:5 78:4 84:11	peers 17:1	58:4 65:5 78:17
objections 58:20	Oral 2:2	84:15,17 85:10	pending 30:20	85:14 88:6
obtain 13:4,15,19	order 60:9 65:2	87:2 89:16,17	53:12	93:10,14,15,16
obvious 37:8,17	ordinary 43:18	89:18 90:14	people 46:20	plus 69:7 71:1,4
60:17	68:4	paragraphs 51:3	perform 52:15	75:22 76:18
obviously 89:9	organization	65:22 66:2	performance	77:4 89:17
obviousness 60:1	22:13 31:15,19	parallel 20:7	18:6,9,10,11,20	90:15,19,19
60:10 61:19	32:1,7	Park 13:11	period 93:16	point 30:18 83:11
63:10 64:18	organizations	part 63:2 86:18	person 17:1,2	91:4
65:8	31:11 32:10	partes 36:3,7,16	27:13 66:22	portion 39:11
October 23:4	organize 22:3,8	39:16	68:4	55:3
		particular 90:8	personal 87:1,9	POSITA 44:10

68:3 84:4,18 position 17:16 19:19 22:16 24:4 positions 7:8 32:7 possible 71:10,17 90:8 practice 67:5 pre-AIA 55:10 56:10 89:13 predictable 59:6 59:12 61:16 prediction 26:6 preparation 8:18 8:21 42:12,20 prepare 7:6 8:4 48:10 prepared 34:8 35:10,13 38:4,5 preparing 35:19 38:1 48:2,14,16 48:19 50:22 president 9:13 pressure 58:10 59:2 61:15 64:3 64:13 primarily 18:5 28:16 primary 23:9 49:8 prior 56:3 65:4 80:19 priority 56:5 probably 88:1,3 problem 58:11 59:2 64:3 Procedure 2:5 93:16 procedures 52:6 52:11,14,16 proceed 70:15 proceeding 10:12 proceedings 7:4,8 7:18 34:9,14,18 36:16 37:21 38:3 48:3,4 49:2 51:12 57:1	64:10,19 65:9 66:8 76:3 process 22:13 35:3,7 85:12 professional 2:7 31:10,13,19 32:10 profile 27:12 29:14 49:21,22 profiles 29:15 program 13:13 20:19 project 29:19 proper 35:8 85:17,18,20 propose 76:6 proposed 73:21 74:14,19 76:1 79:17 82:20 protocol 16:16,16 16:20 17:3,9 85:16 86:10,12 protocols 19:6 24:21 50:9 86:9 86:11,17 provide 60:18 provided 7:20 59:22 PTAB 36:11 81:18 82:15 Public 2:7 92:22 purchased 93:13 purpose 10:12 purposes 60:10 61:19 63:10 pursuant 2:4 pushed 86:13 put 36:18 38:9 51:22 52:1 53:4 53:4 54:13	question 7:13 30:20,21 42:9 55:8 58:22 60:22 65:6 66:20 70:17 73:16 77:3,11 77:16,20,22 78:5 83:6 87:5 91:6 questions 7:17 12:7 88:21 91:15 93:16 94:14,16 quite 8:15 27:5 28:7 60:21 quote 55:10,10 88:13 quoting 51:21 89:18	75:9,11 78:15 81:13 87:11 88:12,13 received 17:5 recess 31:8 68:13 88:7 recognize 34:1,3 recollect 28:8 80:13,16 81:6 recollection 82:6 82:9 87:15 90:13 record 6:7 31:6 58:20 88:6 recorded 94:14 94:16 redirect 89:2 refer 40:1 45:7 73:22 74:1 reference 57:18 referenced 93:11 references 52:1 58:9 59:17 60:9 61:18 63:9 65:2 65:11 referred 46:22 50:14 65:12 77:5 87:11 referring 11:6 46:11,12 75:19 76:7 refers 39:20 45:1 84:10 reflected 34:17 reflecting 69:11 regarding 65:8 65:10 89:7 Registered 2:6 relate 66:3 related 89:12 relates 77:6 relied 51:11 53:7 87:8 relies 43:5 rely 49:1 53:10 70:21 89:11 remember 71:8	71:18 REMOTE 1:15 Rene 3:16 46:13 46:16,17 49:7 54:20 repeat 65:5 74:17 77:3 repetitions 75:13 Rephrase 87:5 report 7:6 8:6,11 14:7,8 44:5,14 44:22 48:5,7,15 48:16,19 51:1 51:22 53:2,5 55:3,6 62:8,21 63:17 76:9,12 76:17 Reported 1:19 reporter 2:7 33:10,12 38:20 38:22 92:21 reporter's 58:3 reports 24:17 represent 39:14 66:2 request 30:15 requesting 84:6 84:20 required 20:3 requirement 66:3 requirements 66:9 residence 15:13 respect 25:10 64:9 response 38:6 39:12,15 42:14 42:18,20 43:12 45:1 83:18 85:3 85:5 responses 37:21 38:2,2 responsibilities 24:7 rest 85:4,5 resume 14:3,5 49:13 50:12,14
--	--	---	---	--

retained 11:1	55:3 56:15,16	90:14	sign 93:12,13	64:3,13
return 67:1	59:5,14 67:13	seen 37:20 42:3,9	signature 34:5	Soon 21:21
review 36:3,7,9	69:5 84:17	42:11 43:2 71:4	93:11,15 94:6	sorry 22:22 24:20
36:16 39:16	scenario 63:19,21	85:15 86:6	94:19 95:22	27:19 30:10
53:17 93:13	school 12:10,13	segmentation	signed 93:15	32:15 34:22
reviewed 73:19	12:19	40:8,10,12,14	signing 93:14	45:13,21 61:8
revisit 89:6	science 13:2,18	40:15,16,17,17	signs 26:4	62:17 64:14
Ricardo 3:4	Scott 46:13,14	segments 41:19	similar 16:17,18	66:12 72:20
Richardson 3:3,9	49:7 54:20 70:5	selected 93:14	17:3 19:10	86:6
right 7:21 10:15	screen 39:1,5	self-explanatory	Sincerely 93:18	sotto 64:4
14:20 15:20	42:3 51:2 57:22	59:3,13	Singh 9:16 10:4	sources 51:21
16:1 31:1,5	68:19,20 76:15	senior 29:8	11:6 46:22 47:9	52:19,20,21,22
39:22 42:3	87:21,22	sent 9:5 41:7	48:18 49:1	53:6
43:13,22 48:6	scroll 42:5,8,15	sentence 43:14	single 22:12	South 3:11
50:16 51:2	43:8,11 44:6	44:8 57:16 62:9	23:18 57:18	speak 8:20 20:4
54:13,16 63:19	54:2 56:14	62:10,16 63:1,8	SIP 25:3	48:1,17,18
65:21 75:7	57:21 65:21	69:8 74:15 84:3	sir 6:6 81:10 83:5	speaking 37:9
76:12,13 81:11	76:15	85:6	sits 23:14	specific 55:7
83:14 89:9,14	scrolling 49:10	separate 74:14	sitting 44:18	specifically 29:22
89:22 90:2	50:18	September 21:19	Sixteen 82:13	89:15
RNC 23:12,13,14	se 22:11	server 18:6,8,10	83:2	specificity 18:13
Robot 22:14	seal 92:15	18:11,20,22	Sixth 3:11	speculate 78:19
role 16:14 17:11	second 55:9	19:2,13,13	skill 28:17,19	78:20 79:4 80:7
17:13 18:1	85:12	servers 84:6,20	68:5	80:9
24:14,15 29:7,8	section 54:15,16	set 28:17,19	skilled 68:2	speculation 71:14
30:13 36:15	57:11,12,19	78:21 92:7,14	small 15:21 16:1	spell 6:7
roles 19:22 28:10	89:7	Setting 31:15	22:2	spend 88:18
28:11	secure 69:6 71:1	seven 7:20 19:21	snippets 51:22	spent 88:10
RPR 1:19 92:21	90:15	75:17,20 76:3,4	53:4	split 41:18,19
Rules 2:5 93:16	security 18:19	82:21 89:22	so-called 55:9	spoke 9:3,9 47:17
	see 14:4 33:4,7	90:10,11	Society 31:14,21	48:9,14
S	36:10 37:2,4,17	share 39:1 68:19	Soft 1:7 7:1 93:6	spoken 10:3 12:1
S 3:1	39:5,7,18 43:13	shared 35:18,19	94:7 95:8	12:4 27:17
S-I-P 25:3	44:8,14 46:4	sharing 87:22	Soft's 7:7	46:21 47:12,21
Sacramento	49:14 50:21	sheet 93:15 94:15	SoftBank 9:20	stack 86:15
15:17	51:3 52:9,12	95:6	10:2 29:4 30:9	stages 30:3
safe 51:16	55:11 56:15	shift 83:16	30:11,12	stand 44:14,22
San 15:9,10,11	57:22 58:12	short 17:8,8	software 16:13	55:6 62:8,11
15:18 24:11	59:8,9 61:3,4,6	short-range	17:20 18:3,6,7	standalone 84:7
sanity 58:3	61:9 68:20 69:3	19:12	18:8,14,14,16	84:21 86:1
sat 88:16	77:13,21 81:13	shortcomings	19:16,17,18	Standard 31:15
satisfy 66:8	82:2,6 83:21	36:17,20 37:5	23:16 86:22	standing 17:1
saw 73:19 75:13	84:10,14	show 36:17,19	solely 71:11	start 22:22 23:3
79:7 81:7	seeing 71:18	77:9	solution 60:17,19	24:12
saying 45:3 59:14	77:15 80:13	showed 74:20	solutions 59:7,12	start-up 26:8,19
63:15 64:6	seeking 69:6,17	sic 88:1	61:17	27:1,4,9,15,21
says 39:11 49:4	70:22 71:5	side 25:21 26:2,4	solve 58:11 59:2	28:13,14

started 21:10 24:13	80:3,11,12,15 80:17 81:4,9,15	79:6 82:19 83:13	55:15 56:6,6 57:6,7 67:9	47:10 76:21
starts 38:15 46:2 69:2 83:22	81:16 82:7 83:6 83:8,8,11	term 74:13,18,20 75:3,3 79:7,9	68:8 72:15 73:16 76:9	told 68:9 69:13 69:15 70:20
state 6:7 49:12 60:4,8 61:20	surprised 81:11 81:19,20 82:4,8	90:4,4,9,20 terms 69:7,16	82:11 thinking 47:16	tools 22:14,15 top 39:7
81:4 87:15 stated 44:17	82:18,18 83:12 83:14	70:3 71:2,5,19 71:20 74:2,10	thought 10:10 37:19	total 75:18 89:22 touch 27:22
statement 44:1,4 44:13,17,19	sworn 6:2 92:10 synonymous	75:11,22 76:5 76:19,22 77:4	thoughts 85:13 thousand 72:10	Trademark 1:1 39:8
62:11 65:19 69:14 87:2,8	40:20 41:14 system 23:10,11	78:9,13,21 79:6 79:16 81:3	72:12 three 7:19 8:1	training 86:21 87:10,18
90:14 statements 61:14	23:12,19 systems 23:6,8,10	82:10,19 83:7 89:18 90:16,17	28:15 34:9,13 34:18 36:16	transcript 2:1 92:4 93:10,12
States 1:1 66:4 station 23:15,16	23:14 24:16 29:3	90:17 test 16:15 17:13	37:21 38:3 40:19 41:1 48:9	94:11 transcription
status 52:6,11,15 52:17	T	18:2,3 19:3,4 20:11 22:15,21	54:16 57:1 59:17 60:8	92:5 94:13,15 transfer 18:18
statutes 56:11 89:13	Tableau 26:13 take 8:13 10:10	23:5,6,9,19 24:16,16,16,17	61:13,17 63:7 63:22 64:1,5,7	17:6 transferred 17:4
stint 22:2 stop 87:22	20:9,11 30:16 30:18,21 31:1,3	25:5,11 77:19 tested 18:19	64:10,11,16,18 65:1,8,13,17	16:22 transport 86:15
Street 1:21 3:5,11 94:2 95:2	37:14,16 45:10 68:10,18 74:9	24:22 testified 6:3,12	66:7 67:3,18 68:7 75:20 76:2	86:19 traversed 59:7,13
study 21:8 studying 20:21	85:14 89:3 taken 2:4 31:8	testimony 65:4 70:10 80:19	76:7,20 77:6 78:13	61:17 trial 6:12
sub-heading 50:19	51:20,22 53:21 68:13 88:7 92:7	testing 16:15 18:4,5,22 20:9	TikTok 1:4 7:14 12:5 81:18	trick 11:17 tried 25:20
submitted 34:9 34:13	talk 8:1 talked 48:13	20:10,12 23:7 24:2 29:18,20	82:14 83:3 93:6 94:7 95:8	trips 24:16 TRIAL 1:2
substantial 26:22 substantially	talking 76:20 talks 40:8	Texas 3:18 93:4 Thank 58:6 89:1	till 17:17 20:20 24:5	true 49:12 65:10 92:5 94:13,15
25:14 substantive 70:12	tea 14:15 teams 20:4,7,11	thereof 92:13 thing 30:19 39:2	time 9:3,9 10:4 10:19 15:6	try 67:13,14 trying 6:20 11:17
suggestion 43:17 Suite 1:21 3:6	technical 54:4 technologies	44:20 88:16 things 17:2 19:2	23:18 26:7,9 27:3,17,22 28:7	37:2,3,4 62:3,4 62:5 63:20 75:2
94:2 95:2 summer 13:17	19:10 25:3 27:2 87:12	20:12 31:13,15 36:13 40:19	30:1 37:16 53:22 83:11	77:18 81:6 tuning 35:7
support 7:7 23:18	technology 12:21 12:22 54:6,8	41:1 52:5 60:9 61:18 63:7	85:14 88:9,18 88:21 91:16	Turning 42:2 turns 91:7
supposed 19:3 39:4	telecommunica... 23:13	86:10 think 10:9 11:15	92:7 93:16 times 28:15 45:2	two 11:20 21:8,9 24:7 28:9,11,20
sure 12:9 25:1 31:13 45:9 57:7	Telecommunic... 13:9	11:16 21:10 35:15,22 36:1,4	74:5 79:9 title 33:20 92:8	37:6,18 46:20 64:1 66:2 68:15
57:13 60:13,15 68:12	tell 14:2 28:1 35:3 70:7 76:14	37:15 43:10 47:17 50:13	titled 50:20,22 today 6:16,19 8:2	74:21 75:4,8,10 TX 3:7
surprise 79:15	76:17 77:10	51:18 52:3 53:1	8:5,18,21 44:18	Tyler 3:18 93:4

typo 44:21 45:12 45:14,15 typographical 45:17	V v 1:6 6:1 93:6 94:7 95:8 V-E-N-U-J-O-... 28:6 various 24:17 30:3 Vazquez 3:16 4:8 9:1,9 33:7,9 46:16,17 48:2 55:19 58:15,19 59:19 60:11 61:21 63:11 65:3,15 66:12 66:16 67:7 70:9 71:13,21 74:4 79:1,10,18 80:4 80:18 81:21 82:22 89:1,5 91:1 Veno 28:4,6 verify 78:7 version 86:3 versions 55:10 56:10 89:13 versus 83:11 view 38:14 Vince 11:13,14 Visveswaraiah 12:21 voce 64:4	wants 83:3 WAP 86:10,11,12 86:14,14,18 87:18 Washington 1:21 94:3 95:3 water 14:13 way 22:9 49:17 54:13 ways 49:20 We're 82:16 we've 79:5 web 21:6 84:6,19 86:1,3 website 22:8 week 15:22 went 13:5 West 3:17 93:3 WHEREOF 92:14 Wi-Fi 25:1,10 WiMAX 25:11 25:12 wireless 17:2 24:17,21 25:2 29:14 wish 32:16 withstand 23:17 witness 4:3 10:13 10:16,20 31:5 59:21 60:13 62:1 63:13 65:5 65:16 66:18 67:9 68:12 71:15 72:1 74:6 79:3,12,20 80:6 80:20 82:1 83:2 88:22 92:9,14 93:13 94:8,19 95:9 WMTP 86:18,18 word 44:15 81:9 85:2 wordings 62:18 work 15:17 16:10 19:5,9 20:21 25:5 37:3,12,14	37:18 workable 60:17 60:19 worked 9:19,19 10:1 16:11 35:6 50:9 working 18:15 28:18 30:7 50:8 write 24:16 34:20 62:21 written 50:22 66:3,9 67:22 93:22 wrote 62:9 63:5 74:15 88:16	14:19 16:7 0 0057 38:16 00757 5:8 38:15 07 56:5 1 1 5:5 33:1 45:11 49:11 58:1 63:2 65:22 68:19 69:1 72:8 84:14 84:17 85:7,11 87:3 88:11 92:4 1:09 91:12 1:15 91:12 10 30:16 100 69:7 71:1,4 72:15,16,19 75:22 76:18 77:4 88:17 89:17 90:15,19 90:19 102 57:8,11,11,12 57:13,19 103 57:13 11 43:12 52:4 68:22 110 72:19,20,21 72:22 73:1,7,20 119 3:17 93:3 12 51:3 13 44:7 14 54:3 55:8 150 88:17,19 16 79:16 80:10,16 81:3,12,14,17 81:19,20 82:5,7 82:11,19 83:7 17 56:15 1717 3:5 1730 1:21 94:2 95:2 195 72:20 1998 12:13
U U.S 1:10,11,12 13:6 20:17,19 Uh-huh 43:15,20 46:5 48:8 55:12 58:2 59:9 61:7 64:20 Ultra 25:5 UMB 25:5,7 UMTS 25:1,7,9 unable 77:10 underlined 39:11 undersigned 92:3 understand 6:15 7:3 34:12 36:14 36:15 37:10 43:5 46:3 49:5 56:17,20,22 58:8 59:22 62:22 66:5 67:1 67:1,21 68:6 73:14 75:15 83:5 90:3,6,7 90:22 understanding 6:18 36:2,7 54:19 59:16 60:7 61:20 65:19 69:3,5 understood 44:10 84:5,18 United 1:1 39:8 66:4 university 13:11 13:13 20:15 21:4,5 USC 57:19 use 18:18 67:12 user 29:15 users 23:18 UWB 16:16	W waive 93:14 want 10:10 12:7 15:4 16:9 27:6 30:18 35:17,20 37:11 42:8 48:12,13 60:14 63:5 67:16 69:1 70:6 78:19,20 79:3 80:6,20,21 87:7,7 89:6,8 89:15,20 90:3 wanted 26:1 81:18 82:14 91:1,3	X X 1:3,9,13 4:1 Y yeah 8:3,10 11:4 11:15 14:10 18:2 20:12 21:10,14 25:2,8 26:18 28:2 29:15,21 30:2,2 32:5 35:8,12 36:13 37:9 43:4 43:10 45:16 47:11,14,20,22 48:5,16 50:2,17 51:18 54:1,11 54:13,21 55:2 55:16 56:7,8 57:8 62:13,15 65:7 67:14 69:21 70:19 71:9 73:10,22 78:16 82:12,14 84:1 86:16 87:17 year 21:9,20 56:3 years 21:8,9 24:8 26:7,10 28:20	Z Zoom 2:8 9:6	

2 5:8 41:20 42:2 44:7 46:1 49:4 83:17 85:3 2:00 2:9 20- 55:14 200 88:17,19 2001 33:5,13,15 2003 32:3,4 20036 1:21 94:3 95:3 2004 32:3,3,4 2005 17:12,17,21 2006 20:15,16 2007 21:10 37:8 84:4,18 85:15 86:8 87:2,6,12 2008 13:17,17 20:20 21:11,13 21:21 23:4 37:8 2010 24:5,10,13 2013 56:3,3,7 2014 25:17,18,19 2014/2013 55:15 2015 28:22,22 2016 28:21 29:1,2 2017 29:6 30:3 2018 9:22 2018/2019 10:1 2019 9:22 202 1:22 94:4 202)-232-0646 93:17 202)232-0646 95:4 2024-00757 39:17 2025 1:17 2:8 92:16 93:7,20 94:9 95:10 21 1:17 2:8 93:7 94:9 95:10 22 57:22 58:7 62:11 63:2,21 23 83:19 232-0646 1:22 94:4 27 65:22 28 65:22	29 83:19 3 3 49:10,12 30 31:3 300 72:18 31st 92:15 33 5:5 69:2 74:16 76:19 77:5 78:4 89:16,18 90:14 336 5:8 40:2,4,7 35 57:18 3G 23:13 4 4:21 91:16 41 5:8 77:2 42 77:2 43 77:2 4G 23:13 5 50 88:17 500 72:6,14 5000 3:6 55402 3:12 6 6 4:7 60 1:12 3:11 67 84:11,15,17 85:10 87:2 7 7 50:19,22 51:3 75201 3:7 757 34:14 75702-7203 3:18 93:4 759 34:14 760 34:14 8 8,756,336B2 1:10 39:21 8,862,757 1:11 8,898,260 1:12 812 1:21 94:2	95:2 89 4:8 9 9 65:22 90 92:5 91 4:9 95 72:19 73:1,1,6 73:20 99 78:21		
---	--	--	--	--