UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRlAL AND APPEAL BOARD

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TIKTOK, INC.,

Petitioner,

v.

CELLSPIN SOFT, INC.,

Patent Owner,

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IPR2024-00767

IPR2024-00768

IPR2024-00769

IPR2024-00770

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REMOTE DEPOSITION OF

PAVAN M. GAJENDRAGAD

Friday, March 28, 2025

Reported By:

Randi J. Garcia, RPR

DIGITAL EVIDENCE GROUP

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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 28, 2025, commencing
9 at approximately 2:00 p.m.
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1 I N D E X

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3 WITNESS: PAVAN M. GAJENDRAGAD

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5 EXAMINATION PAGE

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7 By Mr. Katz: .....5

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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. KATZ:
6 Q. Great. Before we begin, can you
7 state and spell your name for the record.
8 A. Pavan Gajendragad, P-A-V-A-N,
9 G-A-J-E-N-G-A-R-A-D.
10 Q. And what city and state do you reside
11 in?
12 A. San Jose, California.
13 Q. And you understand we are taking your
14 deposition by Zoom here, which means I'm not
15 where you are. I'm just going to ask, do you
16 have any notes in front of you that I should
17 know about?
18 A. I mean, I have the -- I have my
19 resume here, and I have my -- some notes on the
20 declaration and -- yeah.
21 Q. What sort of notes do you have on the
22 declaration?

A. My personal notes as in like the key points and all.

Q. Okay. And by the declaration, you're referring to the declaration that has been submitted in like IPR 2024007700 and three other proceedings?

A. Yes. That is right.

Q. And I assume that you don't have any kind of instant messaging or e-mail app open; is that correct?

A. No. I put everything on airplane mode.

Q. So you're not -- you have no side communication with Mr. Fuller or anyone else associated with CellSpin Soft?

A. No.

Q. If that changes, will you let me know?

A. Yes.

Q. Can you tell me, how did you get involved in these IPR matters?

A. I mean, sometime -- sometime late

1 November or sometime in that frame 2024, I was
2 contacted and I was told that, hey, do you want
3 to take it up, and I looked at the -- I had
4 some initial conversations, and after that
5 counsel kind of got involved, and I thought,
6 okay, I can -- I think I can take it up.
7 Q. And you were contacted by who?
8 A. By the counsel, Scott.
9 Q. Oh, he was the first contact that you
10 had with anyone from CellSpin Soft?
11 A. No. First Bobby contacted me. And
12 Bobby, like the patent owner CellSpin. So he
13 contacted me, me and him had worked together
14 sometime in 2018, I think, yeah, 2018. And
15 yeah, so we had a conversation, and that is how
16 it went about.
17 Q. So the owner of CellSpin Soft reached
18 out to you?
19 A. Yes.
20 Q. I think you had described you and him
21 as being friends?
22 A. Yeah.

1 Q. In preparation for this deposition,
2 just tell me what you did.
3 A. I read the patents and also Scott
4 talked a lot about the --
5 MR. FULLER: Just be sure you
6 don't -- you don't need to tell him what
7 you and I talked about specifically. But
8 just the fact that we spoke is sufficient
9 for now. Thank you.
10 BY MR. KATZ:
11 Q. By Scott, you meant Scott Fuller,
12 counsel for CellSpin Soft?
13 A. Yes.
14 Q. About how long did you speak or meet
15 with Scott in preparation for this deposition?
16 A. Can you please repeat.
17 Q. Without revealing any attorney-client
18 communications or communication with counsel --
19 that is not what I'm asking about -- just about
20 roughly how long were you in communications
21 with Mr. Fuller for preparation of this
22 deposition?

A. Oh, for this deposition?

Q. Yes.

A. Less than five minutes.

Q. So you understand that one of the topics in this case involves Bluetooth 2.1, which was out in roughly 2007?

A. Yes, I understand.

Q. And you personally worked with Bluetooth 2.1 devices?

A. Yes, I have in Qualcomm, during my work at Qualcomm.

Q. And around what time period was that?

A. That was 2010. Before that I was part of Mistral Software. Then I worked with short-range communication protocols, like UWB, that was 2005.

Q. Okay. So you worked with short-range protocols in 2005, and then you actually worked with Bluetooth 2.1 starting in 2010?

A. Yes.

Q. Back in the 2007 time frame and earlier, had you -- even though you weren't

1 working with Bluetooth 2.1, did you actually
2 use Bluetooth devices in 2007 or before that,
3 you personally?
4 A. Yes.
5 Q. What sort of devices had you used?
6 A. I used it on the phone, and I've used
7 Bluetooth mouse.
8 Q. In 2007 or prior?
9 A. Yeah. And yeah, probably like
10 transfer photos, yeah.
11 Q. Prior to 2007 you transferred photos
12 using Bluetooth?
13 A. Prior to 2007? Prior to 2007, I
14 don't exactly recall the time frame, but I've
15 used Bluetooth to transfer pics, yeah.
16 Q. And to transfer pictures between what
17 and what?
18 A. Between -- between -- I don't
19 particularly recall, but I recall testing the
20 Bluetooth set. I have tested UWB
21 communication. I think it is prior to 2007.
22 Right.

1 MR. FULLER: I will remind you,
2 Pavan, if you don't recall specifically, I
3 don't really want you to guess; okay?
4 THE WITNESS: Sure. Yeah. I don't
5 want to guess.
6 BY MR. KATZ:
7 Q. Okay. Do you remember where you were
8 working at the time that you tested the
9 transferring pictures of Bluetooth, even if you
10 don't remember the year?
11 A. No, no, I don't recall that. I said
12 UWB communication when I worked in Mistral
13 Software.
14 Q. Oh, I understand. You're saying you
15 recall transferring pictures wirelessly; you're
16 not sure whether it was Bluetooth?
17 A. Yeah.
18 Q. Okay. Or are you saying that you
19 know it wasn't -- do you recall it was not
20 Bluetooth? I'm trying to figure out what your
21 memory is.
22 A. So in Mistral's office I tested UWB

1 communication. Their testing was basically you
2 transfer a file containing zeros and ones, and
3 you received the file after the communication,
4 after the transfer. You compare the transfer
5 file with the received file, and you determine
6 how different they are. What was the error
7 rate and all that, and the speed, yeah.
8 Q. Okay. So do you think you might have
9 also tested picture transfer with Bluetooth or
10 are you pretty confident you did not?
11 A. So it's a very similar technology.
12 Both are short-range communication
13 technologies.
14 Q. Okay. Yeah, I'm just trying to pin
15 down your Bluetooth experience. I'm just
16 trying to figure out, are you saying you might
17 have done it and tested with Bluetooth, and
18 you're not sure, or you're pretty sure your
19 memory is UWB?
20 A. I'm pretty sure about UWB, yes.
21 Q. So let's look at the -- talk about
22 the first two you mentioned. You said prior to

1 2007 you used Bluetooth on your phone and with
2 a mouse; is that correct?
3 A. Yeah.
4 Q. Was the phone -- what was it
5 connected to, a car or something else?
6 A. I remember having Bluetooth phone. I
7 don't recollect if I played music on the car
8 or -- I don't recollect that precisely.
9 Q. Okay. So you're not sure if you
10 actually used the Bluetooth functionality prior
11 to that -- prior to 2007?
12 A. Prior to 2007 Bluetooth was in its
13 infancy, if I may say. Only a few phones had
14 Bluetooth at that time, integrated within
15 themselves. And it was also very cumbersome to
16 like pair and everything at that time. So I
17 was aware of the technology at that time. I
18 had it in my phone. But testing specifically
19 on the Bluetooth, I don't recall precisely.
20 Q. In the 2007 time frame, do you
21 remember what kind of a phone you had?
22 A. I had Nokia. I had a Motorola.

1 Q. Did both Nokia and Motorola have
2 Bluetooth?
3 A. Yes, they did.
4 Q. Yes. You say you also used a
5 Bluetooth mouse. Was that in 2007 earlier?
6 A. 2007, yes, I used Bluetooth mouse.
7 Yes, I did use Bluetooth mouse.
8 Q. And did that mouse require pairing
9 with the computer?
10 A. I don't recall. I don't recall
11 exactly what model mouse it was. I don't
12 recall.
13 Q. So by 2007, you mentioned that you
14 had Bluetooth on your phone, and used the
15 Bluetooth mouse. Is there any other personal
16 interaction with Bluetooth that you recall, as
17 you sit here today, in that time frame?
18 A. We had some coursework, like
19 introduction of new technologies where it
20 touched upon Bluetooth.
21 Q. No. My question is just about your
22 -- your actual use of Bluetooth, not what you

1 might have learned about it.
2 A. Can you please repeat the question
3 again.
4 Q. Yeah. Could you tell me what other
5 actual experiences you've had using Bluetooth
6 devices in 2007 or earlier beyond the mouse and
7 the phone that had Bluetooth, but even then
8 you're not sure if you actually used the
9 technology? Anything beyond those two
10 examples?
11 A. So in 2007, Bluetooth was in its
12 infancy, and I had a phone which had Bluetooth,
13 I had a mouse which I used specifically. If it
14 was paired, not paired, I'm not particularly
15 sure at this point in time. I don't recall.
16 And there were quite a few kinks, if I may
17 remember, if I may recall, in Bluetooth,
18 battery drain and everything.
19 Q. But my question is, is there anything
20 else in addition to those two examples that you
21 can recall?
22 A. No. No.

1 Q. Do you recall -- first of all, have
2 you actually read the Bluetooth 2.1
3 specification?
4 A. Yes, I have.
5 MR. FULLER: Objection to form.
6 BY MR. KATZ:
7 Q. Do you recall when you first read the
8 Bluetooth 2.1 specification?
9 MR. FULLER: Objection to form.
10 BY MR. KATZ:
11 Q. I'm not trying to ask any kind of
12 trick question or anything. Let me clarify.
13 Not necessarily cover to cover, when
14 do you first recall having a copy of Bluetooth
15 2.1 specification reading, you know,
16 substantial portions of it?
17 A. I needed to do a lot of reading on
18 Bluetooth during Qualcomm, my work at Qualcomm.
19 The chipset had Bluetooth, and we were testing
20 telecommunication chipsets, like the mobile
21 chipsets, which had Bluetooth in them. So
22 Bluetooth was one of the capabilities. So at

that Qualcomm provided us with a lot of material that contained Bluetooth technologies. Their training material had Bluetooth in them. And I had to go through the training, yeah.

So I had to refer to the Bluetooth spec during the training, as well as during my work at Qualcomm.

Q. Can you describe for me, very generally, what your understanding of Bluetooth pairing is in at a very high-level? What is its function?

MR. FULLER: Object to form. Go ahead.

THE WITNESS: Okay. So for pairing, pairing is basically exchange of link keys between the two devices, Bluetooth-enabled devices.

Q. What does the exchange of link keys accomplish? What purpose does pairing serve?

A. What purpose does pairing serve? I know pairing is exchange of link keys, and I know that -- I know that it can be outbound

1 pairing, inbound pairing, wherein you manually
2 key in the link -- keys on the device, or it
3 can happen without that or inside a connection,
4 but I don't want to add more to that.
5 Q. Let me know if you agree with the
6 following description about pairing.
7 A. Okay.
8 Q. Would you agree this is an accurate
9 description? That it's a -- it creates a
10 two-way permanent association between two
11 devices?
12 MR. FULLER: Objection to form.
13 THE WITNESS: Depends on the
14 implementation.
15 Q. So if that statement was in a
16 document, you would actually disagree that that
17 -- that represents the purpose of pairing,
18 generally?
19 A. I have to see the context, but it
20 depends on the implementation.
21 Q. Okay. Doesn't the act of pairing
22 create a permanent association between two

1 devices, such that they are paired?
2 A. It depends on the implementation.
3 One can choose to implement it the other way.
4 Q. What did you mean by the other way?
5 A. Like permanent association is not
6 necessarily -- I mean, pairing does not
7 necessarily mean a permanent association. It
8 can't be implemented either.
9 Q. Are you using -- what kind of meaning
10 of permanent do you have in mind in that
11 answer? You take an extreme case of permanent
12 being forever, into eternity, like an absurd
13 case?
14 A. Yes.
15 Q. If permanent -- let me change it a
16 little bit.
17 Would you agree that pairing provides
18 a two-way association between two devices that
19 will survive a device reset?
20 MR. FULLER: Objection to form.
21 BY MR. KATZ:
22 Q. I will ask a better question. If

1 permanent simply means the association remains
2 through turning the device off and on, you
3 know, you can go look at your list of paired
4 devices, they're still there, unless someone
5 goes in and deletes them, if permanent means
6 that, would you then agree that pairing creates
7 a permanent association between two devices?
8 A. Association of a device -- can you
9 please repeat the questionee again.
10 Q. Sure. If we treat the word permanent
11 not to be -- mean forever, but simply for a
12 very long period of time, longer than a
13 particular communication session, long --
14 survives a power cycle of a device, that sort
15 of permanent, in that case would you agree that
16 pairing provides a two-way permanent
17 association between two devices?
18 MR. FULLER: Objection to form.
19 THE WITNESS: So what do you mean by
20 association of the two devices? Because
21 association is different from pairing.
22 Association is different from pairing.

1 BY MR. KATZ:
2 Q. In what way do you view association
3 as being different than pairing?
4 A. I have to read it up -- I have to
5 read it up better, Steve.
6 Q. Okay.
7 A. It depends on the implementation,
8 basically.
9 Q. So let's shift gears a bit. Are you
10 aware of how a Bluetooth connection is created?
11 A. Yes.
12 Q. Am I correct that a Bluetooth
13 connection is created by one device putting out
14 a -- some kind of paging signal and then the
15 other device provides a page response?
16 A. I have to consult the spec but, yeah.
17 Q. And when you used to create a
18 connection, would you agree that the pager
19 request and paging response is an example of
20 handshaking?
21 MR. FULLER: Objection to form.
22 THE WITNESS: So you used the word

1 handshaking. Can you please ask that
2 again. Can you please repeat question.
3 Q. Sure. You used the term handshaking
4 in your declaration. Do you recall that?
5 A. Yeah.
6 Q. So my question is, is the -- let me
7 ask you some preliminary questions.
8 When a Bluetooth device sends out the
9 page, kind of, to another device, it's kind of
10 saying, hello, out there, is someone there?
11 Colloquially would you agree with that?
12 A. I have to consult the spec. I have
13 to read it.
14 Q. I don't think you will find that sort
15 of colloquially phrasing in the spec. So let
16 me ask it this way then.
17 A communication channel is
18 established with Bluetooth devices because one
19 gives a paging signal and the other will give a
20 paging response saying, here I am; fair?
21 A. So in what context, as in like if you
22 can share a little more, like elaborate the

1 question a little bit more.
2 Q. Okay.
3 A. Elaborate the question a little more.
4 Q. Sure. So I'm referring to two
5 Bluetooth devices, maybe they are paired, maybe
6 they are not. It is my understanding, so let
7 me ask you if I'm correct, that the way
8 Bluetooth connection would get established is
9 one device would send out a paging signal with
10 the address of the other Bluetooth device, and
11 then the Bluetooth device with that address
12 would respond with the paging response, at
13 which point they can establish a connection; is
14 that correct?
15 A. So in the declaration I have put an
16 image when I show the steps taken, step one,
17 step two, step three, step four, step five,
18 what happens, like connection, like create a
19 connection after that you -- there are features
20 exchanged. And after that, there is -- there
21 is connection request, then --
22 Q. Are you referring to an image that

1 came from the Bluetooth spec or an image that
2 was created for you?
3 A. It is from the Bluetooth spec. It's
4 from the Bluetooth spec --
5 Q. So you need --
6 A. -- the steps, the -- what are
7 optional, what are mandatory.
8 Q. Okay. But let me ask you this.
9 Without -- strike that.
10 You do have the Bluetooth spec with
11 you, right? It is Exhibit 1019.
12 A. I don't have it open.
13 Q. Okay. If you need to open it, you
14 can. Let me just ask you this. As you sit
15 here today right now, can you confirm that a
16 Bluetooth connection is established by a paging
17 signal with the address of the desired
18 receiver, and then the receiver, with that
19 address, would give a paging response, and at
20 that point a connection, a Bluetooth connection
21 can be established? Can you confirm that
22 statement or you're just not sure?

1 A. I'm not sure.
2 Q. That's fine. I'm not trying -- go
3 ahead.
4 A. Bluetooth spec is really vague. I
5 think it's more than a thousand pages long.
6 Yeah. So I don't remember everything, yeah.
7 Q. That's fine.
8 Would you agree just at a very
9 general level, outside Bluetooth, that a simple
10 protocol such as a hello message with the
11 address of you who want to talk to, then a
12 response from a device, with that matching that
13 address saying, I'm here, that would be an
14 example of a handshake?
15 MR. FULLER: Objection to form.
16 THE WITNESS: Please repeat the
17 question. You are trying to understand
18 what handshake -- we are trying to
19 understand what a handshake is. You
20 quoted some things. Can you please repeat
21 that.
22 Q. Sure. I'm wondering if you would

1 agree, that in the most general example, even
2 setting aside Bluetooth, just generally, two
3 things are communicating, one says, Hello,
4 receiver X, are you out there? Receiver X
5 says, Yes, I'm here, that that is sufficient to
6 be an example of a handshake as that term is
7 understood in communications and networking?
8 A. I mean, it depends. A lot of it
9 depends on the implementation. There are
10 multiple types of handshakes that are two-way,
11 three-way, four-way handshakes. So I'm not
12 sure. It depends, basically on the
13 implementation.
14 Q. Okay. In your declaration you cite
15 to Wikipedia a few times. Do you know how
16 Wikipedia articles are created?
17 A. Yes, in general.
18 Q. How -- what is your understanding?
19 A. I mean, it is a free website, so
20 multiple people contribute for an article.
21 Yeah.
22 Q. Do you rely on Wikipedia in the

1 course of your consulting work, apart from
2 generally expert declarations such as you have
3 done here?
4 MR. FULLER: Objection to form.
5 THE WITNESS: Can you please say that
6 again. Are you asking me if I contribute
7 to the Wikipedia itself?
8 BY MR. KATZ:
9 Q. No, no. My question is -- first of
10 all, I take it your -- are you currently --
11 what is your current occupation today?
12 A. I'm a data engineer.
13 Q. You're a data engineer. In the
14 course of your work as a data engineer, as
15 opposed to your work supporting declarations,
16 such as you filed in these cases, do you
17 reference and rely on Wikipedia?
18 A. Sometimes, sometimes. Yes.
19 Q. Can you give me an example of when
20 you would consider doing that?
21 A. If I need to understand something,
22 which is -- where I don't want to go very deep

1 and read the article or something like that,
2 which is more straightforward and well laid
3 out, I refer to Wikipedia.
4 (clarification by the reporter)
5 BY MR. KATZ:
6 Q. Laid out, L-A-I-D-O-U-T?
7 A. Yes. Laid out, yeah, nicely. I
8 mean, I also -- if I'm implementing something
9 very important or something like that, I will
10 definitely cross check, cross verify what is on
11 the Wikipedia, because I know it's a free
12 website and, yeah.
13 Q. Are you familiar with public key
14 cryptography?
15 A. A little.
16 Q. Can you tell me generally how it
17 works at very a high level?
18 A. Public key cryptography; right?
19 Q. By the way, Mr. Fuller doesn't want
20 you to guess and I actually don't want you to
21 guess. So if you don't feel comfortable
22 answering, just say I'm really not comfortable

1 answering, that's fine too. I'm not trying to
2 force you to give me an answer you don't have.
3 A. I mean, I don't have extensive PSGR,
4 like in cryptography, but as I understand,
5 cryptography keys are exchanged to encrypt and
6 decrypt the data, like on both sides. Yeah.
7 Q. Are you familiar enough to know that
8 each side would have a private key and a public
9 key?
10 A. Yes.
11 Q. And so when I -- when one side gets
12 data from the other side, it decrypts that data
13 using the other side's public key?
14 A. Yes.
15 Q. And so if you're using public key
16 cryptography, would you agree with me that each
17 side is authenticating the messages they are
18 getting -- they're getting from decryptment
19 using the other side's public key?
20 MR. FULLER: Objection for form.
21 THE REPORTER: Counsel, you broke up.
22 Q. I will strike that last question,

1 because it seemed to get garbled on the record
2 anyway, and reask it.
3 Would you agree with me that when you
4 are exchanging messages with someone using
5 public key cryptography, you -- the act of
6 decoding messaging using public key
7 cryptography authenticates the source of the
8 messages?
9 MR. FULLER: Objection to form.
10 THE WITNESS: So let me process my
11 thoughts and answer that. So basically it
12 depends on the implementation. If
13 authentication is -- is required,
14 cryptography, it may not be required, like
15 if authentication is mandatory -- is made
16 mandatory, it may not be required.
17 Q. Well, my question was a little
18 different. If I receive a message using public
19 key cryptography, and to decode that message
20 I'm using the sender's public key, isn't that
21 sufficient to authenticate the source of the
22 message?

1 MR. FULLER: Objection to form.
2 THE WITNESS: I mean, there's a
3 man-in-the-middle attacks happen --
4 man-in-the-middle attacks can happen, so
5 it depends.
6 Q. Are you saying that someone can spoof
7 a message without having the private key?
8 A. Yeah. I mean, a lot of security
9 breaches happening these days. So it is
10 possible.
11 Q. Let me ask you. Just to be clear.
12 I -- again, I'm not asking your speculation. I
13 just want to know what you actually know.
14 A. Sure.
15 Q. So are you saying it is possible to
16 spoof a public key cryptography message without
17 the private key or that there's ways to hack so
18 that you know the private key?
19 A. I'm not a security expert but there
20 is -- there have been reports where -- where
21 man-in-the-middle attacks are real. And there
22 are ways to hack SSH also, so yeah.

1 Q. You discussed some something called
2 OBEX.
3 A. Yeah, O-B-E-X.
4 Q. What is that?
5 A. It is Object Exchange protocol.
6 Q. Now, do you believe that the patents
7 require the use of OBEX?
8 A. It's not mandatory. Depends on the
9 implementation.
10 Q. And you cite to OBEX in forming your
11 opinions; is that correct?
12 A. Yes, as in some them, yes.
13 Can you ask the question again?
14 Q. Do you believe or is it your opinion
15 that the OBEX specification helps shed light on
16 the meaning of object in the CellSpin patents?
17 A. Yes.
18 Q. Why is that?
19 A. You're asking me why OBEX is
20 mentioned?
21 Q. No. I'm asking why you believe the
22 interpretation of the word object in OBEX

1 should help you understand what the term object
2 means in the CellSpin patents?
3 A. OBX was mentioned in the patents,
4 hence, I referred that. During my research,
5 like I heard about OBEX on Wikipedia, on
6 Microsoft dictionary, Bluetooth devices spec as
7 well. Yeah.
8 Q. Does the patent state that when it's
9 using the term object it means the term should
10 be used in the same sense as OBEX?
11 A. No. OBEX -- like I said, it depends
12 on the implementation. OBEX is not mandatory.
13 Q. Would you agree that the meaning of
14 object in the patent is broader than the
15 meaning of it in OBEX?
16 MR. FULLER: Objection to form.
17 Q. Actually I said that in singular.
18 Let me ask it again.
19 Is it your opinion that the meaning
20 of object in the CellSpin patents we're
21 discussing is broader than the meaning of
22 object in the OBEX specification?

1 MR. FULLER: Object to form.
2 THE WITNESS: I'll have to read the
3 OBEX spec again. So I have consulted the
4 Microsoft dictionary and OBEX spec, so
5 that is where I stand.
6 BY MR. KATZ:
7 Q. Would you say that the OBEX spec
8 might be informative to you, but it is not
9 dispositive?
10 MR. FULLER: Objection to form.
11 THE WITNESS: Can you explain that
12 again. OBEX spec, what is the word used?
13 What is the word you used, OBEX spec?
14 Q. Isn't OBEX a specification?
15 A. Yes.
16 Q. Okay. So my question is, did you
17 view the OBEX specification as helping
18 understand what object means in the CellSpin
19 patents, but you didn't treat it as giving you
20 a definition of object in the CellSpin patents;
21 is that correct?
22 A. I consulted OBEX spec, Microsoft

1 dictionary, Wikipedia, Bluetooth spec and came
2 up with my definition of how I define an
3 object.
4 Q. Can you confirm for me at least the
5 BlackBerry mobile device had a mobile web
6 browser in the 2007 time frame?
7 A. I have personally not used BlackBerry
8 myself, and in 2007 especially. And they were
9 considered the Smartphones at that time, so,
10 yeah.
11 Q. Can you confirm for me that there
12 were mobile web browsers on mobile phones in
13 2007?
14 A. If there are, very few.
15 Q. And I just need a clarification on
16 that answer. You said, if there are, there
17 were few. Can you confirm for me, do you know,
18 that, in fact, there were mobile web browsers
19 on mobile phones in 2007?
20 A. I mean, if they had a web browser,
21 I'm pretty sure it was WAP-based, WAP-based
22 browsers.

1 Q. I want to make sure I've got your
2 testimony, because you used the word "if"
3 again.
4 Are you -- is your testimony you're
5 actually not aware of any of such web browsers
6 in 2007?
7 A. In 2007, the question is in 2007
8 whether web browsers on mobile phones?
9 Q. That is the question.
10 A. There have been browsers in 2007 on a
11 mobile device.
12 Q. Okay. And what could those web
13 browsers do, for example?
14 MR. FULLER: Objection to form.
15 Q. If you know. Let me ask a better
16 question.
17 Are you aware of sorts of things the
18 web browsers could do that were on mobile
19 phones in 2007?
20 A. I had a very simple phone back in the
21 day, in 2007. If they did some, it was very
22 limited. They kept the use of that very

1 limited. That much I can tell for sure. And
2 they were also based on WAP protocol stack.
3 That much I'm sure. And WAP protocol stack in
4 itself has a separate transport layer,
5 everything, the whole protocol stack. So --
6 Q. Go ahead.
7 A. That's about what I can summarize. I
8 did not own a phone with a browser at that
9 time.
10 Q. Okay. Are you aware of the existence
11 of WAP gateways in 2007?
12 A. Yeah. Yes.
13 Q. And what was the role of a WAP
14 gateway?
15 A. Okay. So gateway as such the word
16 gateway itself is like -- it is like an
17 intermediary between -- between mobile and the
18 web. So it was the gateway, like the mobile
19 would communicate with the WAP server and
20 then -- of the gateway, and then it would
21 communicate with the rest of the web.
22 Q. So the gateway would act as a

1 translator between WAP protocol and web
2 protocols?
3 MR. FULLER: Objection to form.
4 THE WITNESS: Generally, yes. Yes.
5 BY MR. KATZ:
6 Q. So on one side the gateway is talking
7 WAP to the phone, and on the other side the
8 gateway is talking HTTP to a web server?
9 A. We are going deep here. So I don't
10 -- I don't know. So it depends on the
11 implementation. It depends on the
12 implementation.
13 MR. KATZ: Okay. Let's take a
14 10-minute break.
15 (Thereupon, a brief recess was taken.)
16 MR. KATZ: I have no further
17 questions. Thank you.
18 MR. FULLER: No questions for me.
19 We'll give the witness an opportunity to
20 review and sign.
21 (Time Noted: 3:10 p.m.)
22

CERTIFICATE

I, the undersigned authority, hereby certify that the foregoing transcript, page 1 through 39 is a true and correct transcription of the deposition of PAVAN M. GAJENDRAGAD, taken before me at the time and place set forth on the title page hereof.

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

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

IN WITNESS WHEREOF I hereunto set my hand and affix official seal this 7th day of April, 2025.

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**A**

**above-captioned** 2:3
**absent** 40:21
**absurd** 19:12
**accomplish** 17:19
**accurate** 18:8
**acknowledge** 41:10
**act** 18:21 30:5 37:22
**actual** 14:22 15:5
**add** 18:4
**addition** 15:20
**address** 23:10,11 24:17,19 25:11 25:13
**advise** 40:14
**advised** 40:10
**affix** 39:15
**agree** 18:5,8 19:17 20:6,15 21:18 22:11 25:8 26:1 29:16 30:3 33:13
**ahead** 17:13 25:3 37:6
**airplane** 6:11
**allowed** 40:16
**and/or** 40:14
**answer** 19:11 29:2 30:11 35:16
**answering** 28:22 29:1
**answers** 41:13,16
**anyway** 30:2
**apart** 27:1
**app** 6:9
**APPEAL** 1:1
**applicable** 40:16
**appropriate** 41:12
**approximately** 2:9
**April** 39:16
**article** 26:20 28:1
**articles** 26:16
**aside** 26:2
**asking** 8:19 27:6 31:12 32:19,21
**associated** 6:15
**association** 18:10 18:22 19:5,7,18 20:1,7,8,17,20 20:21,22 21:2
**assume** 6:8
**attached** 41:15
**attacks** 31:3,4,21
**attorney-client** 8:17
**authenticate** 30:21
**authenticates** 30:7
**authenticating** 29:17
**authentication** 30:13,15
**authority** 39:3
**aware** 13:17 21:10 36:5,17 37:10

**B**

**back** 9:21 36:20
**based** 37:2
**basically** 12:1 17:15 21:8 26:12 30:11
**battery** 15:18
**believe** 32:6,14 32:21
**better** 19:22 21:5 36:15
**beyond** 15:6,9
**bit** 19:16 21:9 23:1
**BlackBerry** 35:5 35:7
**Bluetooth** 9:5,9 9:19 10:1,2,7 10:12,15,20 11:9,16,20 12:9 12:15,17 13:1,6 13:10,12,14,19 14:2,5,6,7,14 14:15,16,20,22 15:5,7,11,12,17 16:2,8,14,18,19 16:21,22 17:2,3 17:5,9 21:10,12 22:8,18 23:5,8 23:10,11 24:1,3 24:4,10,16,20 25:4,9 26:2 33:6 35:1
**Bluetooth-ena...** 17:16
**BOARD** 1:1
**Bobby** 7:11,12
**Boston** 3:6
**box** 41:12
**breaches** 31:9
**break** 38:14
**brief** 38:15
**broader** 33:14,21
**broke** 29:21
**browser** 35:6,20 37:8
**browsers** 35:12 35:18,22 36:5,8 36:10,13,18

**C**

**C** 3:1
**c/o** 40:1
**California** 5:12
**call** 40:17
**called** 2:2 32:1
**capabilities** 16:22
**car** 13:5,7
**case** 9:5 19:11,13 20:15 40:6 41:7 42:8
**cases** 27:16
**cause** 39:12
**CellSpin** 1:4 6:15 7:10,12,17 8:12 32:16 33:2,20 34:18,20 40:6 41:7 42:8
**CERTIFICATE** 39:1
**certify** 39:4,9,11
**change** 19:15 42:11
**changes** 6:17 41:14
**channel** 22:17
**check** 28:10 41:12
**chipset** 16:19
**chipsets** 16:20,21
**choose** 19:3
**cite** 26:14 32:10
**city** 5:10
**Civil** 2:5
**clarification** 28:4 35:15
**clarify** 16:12
**clear** 31:11
**colloquially** 22:11,15
**come** 40:12
**comfortable** 28:21,22
**commencing** 2:8
**communicate** 37:19,21
**communicating** 26:3
**communication** 6:14 8:18 9:15 10:21 11:12 12:1,3,12 20:13 22:17
**communications** 8:18,20 26:7
**compare** 12:4
**complete** 40:11 41:13,15
**computer** 14:9
**confident** 12:10
**confirm** 24:15,21 35:4,11,17
**connected** 13:5
**connection** 18:3 21:10,13,18 23:8,13,18,19 23:21 24:16,20 24:20
**consent** 40:22
**consider** 27:20
**considered** 35:9
**consult** 21:16 22:12
**consulted** 34:3 34:22
**consulting** 27:1
**contact** 7:9
**contacted** 7:2,7 7:11,13
**contained** 17:2
**containing** 12:2
**context** 18:19 22:21
**contribute** 26:20 27:6
**conversation** 7:15
**conversations** 7:4
**copy** 16:14 40:13
**Copying** 40:21
**Copyright** 40:20
**correct** 6:10 13:2 21:12 23:7,14 32:11 34:21 39:5 41:13,15
**counsel** 3:2,14 7:5,8 8:12,18 29:21 39:12 40:14,15
**course** 27:1,14
**coursework** 14:18
**COURT** 39:18
**cover** 16:13,13
**create** 18:22 21:17 23:18
**created** 21:10,13 24:2 26:16
**creates** 18:9 20:6

**cross** 28:10,10
**cryptography** 28:14,18 29:4,5 29:16 30:5,7,14 30:19 31:16
**cumbersome** 13:15
**current** 27:11
**currently** 27:10
**cycle** 20:14

**D**

**D** 4:1 5:1,1
**D.C** 1:21 41:3 42:3
**Dallas** 3:12
**data** 27:12,13,14 29:6,12,12
**Date** 40:7 41:9,19 41:22 42:10,22
**day** 36:21 39:15
**days** 31:9
**declaration** 5:20 5:22 6:3,4 22:4 23:15 26:14
**declarations** 27:2 27:15
**decode** 30:19
**decoding** 30:6
**decrypt** 29:6
**decryptment** 29:18
**decrypts** 29:12
**deep** 27:22 38:9
**define** 35:2
**definitely** 28:10
**definition** 34:20 35:2
**deletes** 20:5
**depends** 18:13,20 19:2 21:7 26:8 26:9,12 30:12 31:5 32:8 33:11 38:10,11
**deponent** 40:8,12 40:14
**deposition** 1:14 2:1,4 5:14 8:1 8:15,22 9:1 39:6 40:7,15 41:9,11 42:10
**describe** 17:8
**described** 7:20
**description** 18:6 18:9
**desired** 24:17
**determine** 12:5
**device** 18:2 19:19 20:2,8,14 21:13 21:15 22:8,9 23:9,10,11 25:12 35:5 36:11
**devices** 9:9 10:2 10:5 15:6 17:16 17:17 18:11 19:1,18 20:4,7 20:17,20 22:18 23:5 33:6
**dictionary** 33:6 34:4 35:1
**different** 12:6 20:21,22 21:3 30:18
**Digital** 1:20 40:19,20 41:1 42:1
**disagree** 18:16
**discussed** 32:1
**discussing** 33:21
**dispositive** 34:9
**document** 18:16
**doing** 27:20
**drain** 15:18
**Drive** 3:5
**duly** 5:2 39:10

**E**

**E** 3:1,1 4:1 5:1
**e-mail** 6:9
**earlier** 9:22 14:5 15:6
**either** 19:8
**elaborate** 22:22 23:3
**electronically** 40:21
**encrypt** 29:5
**engineer** 27:12 27:13,14
**errata** 40:15 41:15 42:6
**error** 12:6
**especially** 35:8
**Esq** 3:4,9,16
**establish** 23:13
**established** 22:18 23:8 24:16,21
**eternity** 19:12
**event** 39:13
**Evidence** 1:20 40:19,20 41:1 42:1
**exactly** 10:14 14:11
**Examination** 2:3 4:5 5:4
**examined** 5:2 41:11
**example** 21:19 25:14 26:1,6 27:19 36:13
**examples** 15:10 15:20
**exchange** 17:15 17:18,21 32:5
**exchanged** 23:20 29:5
**exchanging** 30:4
**Exhibit** 24:11
**existence** 37:10
**experience** 12:15
**experiences** 15:5
**expert** 27:2 31:19
**explain** 34:11
**express** 40:22
**extensive** 29:3
**extreme** 19:11

**F**

**fact** 8:8 35:18
**fair** 22:20
**familiar** 28:13 29:7
**features** 23:19
**Federal** 2:5
**feel** 28:21
**Ferguson** 3:17 40:3
**figure** 11:20 12:16
**file** 12:2,3,5,5
**filed** 27:16
**find** 22:14
**fine** 25:2,7 29:1
**first** 5:2 7:9,11 12:22 16:1,7,14 27:9
**Fish** 3:3,8
**five** 9:3 23:17
**following** 18:6
**follows** 5:3
**forbidden** 40:21
**force** 29:2
**foregoing** 39:4 41:11
**forever** 19:12 20:11
**form** 16:5,9 17:12 18:12 19:20 20:18 21:21 25:15 27:4 29:20 30:9 31:1 33:16 34:1 34:10 36:14 38:3
**forming** 32:10
**forth** 39:7
**forward** 40:15
**four** 23:17
**four-way** 26:11
**frame** 7:1 9:21 10:14 13:20 14:17 35:6
**free** 26:19 28:11
**Friday** 1:16 2:8
**friends** 7:21
**front** 5:16
**Fuller** 3:16 6:14 8:5,11,21 11:1 16:5,9 17:12 18:12 19:20 20:18 21:21 25:15 27:4 28:19 29:20 30:9 31:1 33:16 34:1,10 36:14 38:3,18
**function** 17:11
**functionality** 13:10
**further** 38:16 39:9,11

**G**

**G** 5:1,1
**G-A-J-E-N-G-...** 5:9
**Gajendragad** 1:15 2:2 4:3 5:8 39:6
**Gajenragad** 40:1 40:8 41:8 42:9
**garbled** 30:1
**Garcia** 1:19 2:6 39:18
**Garteiser** 3:15 40:2
**gateway** 37:14,15 37:16,18,20,22 38:6,8
**gateways** 37:11
**gears** 21:9
**general** 25:9 26:1 26:17
**generally** 17:9 18:18 26:2 27:2 28:16 38:4
**getting** 29:18,18
**give** 22:19 24:19 27:19 29:2 38:19
**given** 41:13,16
**gives** 22:19
**giving** 34:19

**go** 17:4,12 20:3 25:2 27:22 37:6
**goes** 20:5
**going** 5:15 38:9
**governing** 40:16
**Great** 5:6
**Group** 1:20 40:19,20 41:1 42:1
**guess** 11:3,5 28:20,21
**Gupta** 3:9

**H**

**hack** 31:17,22
**hand** 39:15
**handshake** 25:14 25:18,19 26:6
**handshakes** 26:10,11
**handshaking** 21:20 22:1,3
**happen** 18:3 31:3 31:4
**happening** 31:9
**happens** 23:18
**heard** 33:5
**hello** 22:10 25:10 26:3
**help** 33:1
**helping** 34:17
**helps** 32:15
**hereof** 39:8
**hereunto** 39:14
**hesitate** 40:17
**hey** 7:2
**high** 28:17
**high-level** 17:10
**Honea** 3:15 40:2
**HTTP** 38:8

**I**

**image** 23:16,22 24:1
**implement** 19:3
**implementation** 18:14,20 19:2 21:7 26:9,13 30:12 32:9 33:12 38:11,12
**implemented** 19:8
**implementing** 28:8
**important** 28:9
**inbound** 18:1
**including** 40:21
**infancy** 13:13 15:12
**informative** 34:8
**initial** 7:4
**inside** 18:3
**instant** 6:9
**integrated** 13:14
**interaction** 14:16
**interested** 39:13
**intermediary** 37:17
**interpretation** 32:22
**introduction** 14:19
**involved** 6:21 7:5
**involves** 9:5
**IPR** 6:5,21
**IPR2024-00767** 1:7
**IPR2024-00768** 1:8
**IPR2024-00769** 1:9
**IPR2024-00770** 1:10

**J**

**J** 1:19 2:6 5:1
**Jose** 5:12

**K**

**Katz** 3:4 4:7 5:5 8:10 11:6 16:6 16:10 19:21 21:1 27:8 28:5 34:6 38:5,13,16
**kept** 36:22
**key** 6:1 18:2 28:13,18 29:8,9 29:13,15,19 30:5,6,19,20 31:7,16,17,18
**keys** 17:15,18,21 18:2 29:5
**kind** 6:9 7:5 13:21 16:11 19:9 21:14 22:9 22:9
**kinks** 15:16
**know** 5:17 6:18 11:19 16:15 17:21,22,22 18:5 20:3 26:15 28:11 29:7 31:13,13,18 35:17 36:15 38:10

**L**

**L-A-I-D-O-U-T** 28:6
**L.L.C** 41:1
**laid** 28:2,6,7
**late** 6:22
**law** 39:10
**layer** 37:4
**learned** 15:1
**let's** 12:21 21:9 38:13
**level** 25:9 28:17
**light** 32:15
**limited** 36:22 37:1
**Line** 42:11
**link** 17:15,18,21 18:2
**list** 20:3
**little** 19:16 22:22 23:1,3 28:15 30:17
**LLC** 42:1
**long** 8:14,20 20:12,13 25:5
**longer** 20:12
**look** 12:21 20:3
**looked** 7:3
**lot** 8:4 16:17 17:1 26:8 31:8

**M**

**M** 1:15,21 2:2 3:16 4:3 39:6 40:1,8 41:2,8 42:2,9
**MA** 3:6
**Main** 3:10
**man-in-the-mi...** 31:3,4,21
**mandatory** 24:7 30:15,16 32:8 33:12
**manually** 18:1
**March** 1:16 2:8 40:7 41:9 42:10
**Marina** 3:5
**matching** 25:12
**material** 17:2,3
**matter** 2:3 40:11
**matters** 6:21
**mean** 5:18 6:22 19:4,6,7 20:11 20:19 26:8,19 28:8 29:3 31:2 31:8 35:20
**meaning** 19:9 32:16 33:13,15 33:19,21
**means** 5:14 20:1 20:5 33:2,9 34:18
**meant** 8:11
**meet** 8:14
**memory** 11:21 12:19
**mentioned** 12:22 14:13 32:20 33:3
**message** 25:10 30:18,19,22 31:7,16
**messages** 29:17 30:4,8
**messaging** 6:9 30:6
**Microsoft** 33:6 34:4,22
**mind** 19:10
**minutes** 9:3
**Mistral** 9:14 11:12
**Mistral's** 11:22
**mobile** 16:20 35:5,5,12,12,18 35:19 36:8,11 36:18 37:17,18
**mode** 6:12
**model** 14:11
**Motorola** 13:22 14:1
**mouse** 10:7 13:2 14:5,6,7,8,11 14:15 15:6,13
**multiple** 26:10 26:20
**music** 13:7

**N**

**N** 3:1 4:1 5:1,1
**name** 5:7 41:8 42:9
**necessarily** 16:13 19:6,7
**need** 8:6 24:5,13 27:21 35:15
**needed** 16:17
**networking** 26:7
**new** 14:19
**nicely** 28:7
**Nokia** 13:22 14:1
**Notary** 2:7 39:19 41:22
**noted** 38:21 41:14
**notes** 5:16,19,21 6:1
**noticing** 40:15
**noting** 40:15

**November** 7:1
**NW** 1:21 41:2 42:2

**O**

**O-B-E-X** 32:3
**OBEX** 32:2,7,10 32:15,19,22 33:5,10,11,12 33:15,22 34:3,4 34:7,12,13,14 34:17,22
**object** 17:12 32:5 32:16,22 33:1,9 33:14,20,22 34:1,18,20 35:3
**Objection** 16:5,9 18:12 19:20 20:18 21:21 25:15 27:4 29:20 30:9 31:1 33:16 34:10 36:14 38:3
**OBX** 33:3
**occupation** 27:11
**office** 1:1 11:22 40:12,17
**official** 39:15
**Oh** 7:9 9:1 11:14
**okay** 6:3 7:6 9:17 11:3,7,18 12:8 12:14 13:9 17:14 18:7,21 21:6 23:2 24:8 24:13 26:14 34:16 36:12 37:10,15 38:13
**ones** 12:2
**open** 6:9 24:12 24:13
**opinion** 32:14 33:19
**opinions** 32:11
**opportunity** 38:19
**opposed** 27:15
**option** 40:14,14
**optional** 24:7
**Oral** 2:2
**original** 40:15
**outbound** 17:22
**outside** 25:9
**owner** 1:4 3:14 7:12,17

**P**

**P** 3:1,1 5:1
**P-A-V-A-N** 5:8
**P.C** 3:3,8
**p.m** 2:9 38:21
**page** 4:5 21:15 22:9 39:4,8 40:15 41:6 42:11
**pager** 21:18
**pages** 25:5 41:11
**paging** 21:14,19 22:19,20 23:9 23:12 24:16,19
**pair** 13:16
**paired** 15:14,14 19:1 20:3 23:5
**pairing** 14:8 17:10,14,15,19 17:20,21 18:1,1 18:6,17,21 19:6 19:17 20:6,16 20:21,22 21:3
**Park** 3:5
**part** 9:14
**particular** 20:13
**particularly** 10:19 15:14
**parties** 39:12
**patent** 1:1,1,4 3:14 7:12 33:8 33:14
**patents** 8:3 32:6 32:16 33:2,3,20 34:19,20
**Pavan** 1:15 2:2 4:3 5:8 11:2 39:6 40:1,8 41:8 42:9
**people** 26:20
**period** 9:12 20:12 40:16
**permanent** 18:10 18:22 19:5,7,10 19:11,15 20:1,5 20:7,10,15,16
**personal** 6:1 14:15
**personally** 9:8 10:3 35:7
**Petitioner** 1:3 3:2
**phone** 10:6 13:1 13:4,6,18,21 14:14 15:7,12 36:20 37:8 38:7
**phones** 13:13 35:12,19 36:8 36:19
**photos** 10:10,11
**phrasing** 22:15
**pics** 10:15
**picture** 12:9
**pictures** 10:16 11:9,15
**pin** 12:14
**place** 39:7
**played** 13:7
**please** 8:16 15:2 20:9 22:1,2 25:16,20 27:5 40:10,14,15,16
**point** 15:15 23:13 24:20
**points** 6:2
**portions** 16:16
**possible** 31:10,15
**power** 20:14
**precisely** 13:8,19
**preliminary** 22:7
**preparation** 8:1 8:15,21
**pretty** 12:10,18 12:20 35:21
**prior** 10:8,11,13 10:13,21 12:22 13:10,11,12
**private** 29:8 31:7 31:17,18
**probably** 10:9
**Procedure** 2:5 40:16
**proceedings** 6:6
**process** 30:10
**Professional** 2:7
**protocol** 25:10 32:5 37:2,3,5 38:1
**protocols** 9:15,18 38:2
**provided** 17:1
**provides** 19:17 20:16 21:15
**PSGR** 29:3
**public** 2:7 28:13 28:18 29:8,13 29:15,19 30:5,6 30:18,20 31:16 39:19
**purchased** 40:13
**purpose** 17:19,20 18:17
**pursuant** 2:4
**put** 6:11 23:15
**putting** 21:13

**Q**

**Qualcomm** 9:10 9:11 16:18,18 17:1,7
**question** 14:21 15:2,19 16:12 19:22 22:2,6 23:1,3 25:17 27:9 29:22 30:17 32:13 34:16 36:7,9,16
**questionee** 20:9
**questions** 22:7 38:17,18 40:16 41:14,16
**quite** 15:16
**quoted** 25:20

**R**

**R** 3:1,4 5:1
**Randi** 1:19 2:6 39:18
**rate** 12:7
**reached** 7:17
**read** 8:3 16:2,7 21:4,5 22:13 28:1 34:2 41:10
**reading** 16:15,17
**ready** 40:11
**real** 31:21
**really** 11:3 25:4 28:22
**reask** 30:2
**recall** 10:14,19 10:19 11:2,11 11:15,19 13:19 14:10,10,12,16 15:15,17,21 16:1,7,14 22:4
**receive** 30:18
**received** 12:3,5
**receiver** 24:18,18 26:4,4
**recess** 38:15
**recollect** 13:7,8
**record** 5:7 30:1
**recorded** 41:14 41:16
**refer** 17:5 28:3
**reference** 27:17
**referenced** 40:11
**referred** 33:4
**referring** 6:4 23:4,22
**Registered** 2:6
**rely** 26:22 27:17
**remains** 20:1
**remember** 11:7 11:10 13:6,21 15:17 25:6
**remind** 11:1
**REMOTE** 1:14
**repeat** 8:16 15:2 20:9 22:2 25:16 25:20

**Reported** 1:18
**reporter** 2:7 28:4 29:21 39:18
**reports** 31:20
**represents** 18:17
**request** 21:19 23:21
**require** 14:8 32:7
**required** 30:13 30:14,16
**research** 33:4
**reset** 19:19
**reside** 5:10
**respond** 23:12
**response** 21:15 21:19 22:20 23:12 24:19 25:12
**rest** 37:21
**resume** 5:19
**revealing** 8:17
**review** 38:20 40:13
**Richardson** 3:3,8
**right** 6:7 10:22 24:11,15 28:18
**Rishi** 3:9
**role** 37:13
**roughly** 8:20 9:6
**RPR** 1:19 39:18
**Rules** 2:5 40:16

**S**

**S** 3:1
**San** 5:12
**saying** 11:14,18 12:16 22:10,20 25:13 31:6,15
**says** 26:3,5
**Scott** 3:16 7:8 8:3 8:11,11,15
**seal** 39:15
**security** 31:8,19
**see** 18:19
**selected** 40:14
**send** 23:9
**sender's** 30:20
**sends** 22:8
**sense** 33:10
**separate** 37:4
**serve** 17:19,20
**server** 37:19 38:8
**session** 20:13
**set** 10:20 39:7,14
**setting** 26:2
**share** 22:22
**shed** 32:15
**sheet** 40:15 41:15 42:6
**shift** 21:9
**short-range** 9:15 9:17 12:12
**show** 23:16
**side** 6:13 29:8,11 29:12,17 38:6,7
**side's** 29:13,19
**sides** 29:6
**sign** 38:20 40:12 40:13
**signal** 21:14 22:19 23:9 24:17
**signature** 40:11 40:15 41:6,19 42:22
**signed** 40:15
**signing** 40:14
**similar** 12:11
**simple** 25:9 36:20
**simply** 20:1,11
**Sincerely** 40:18
**singular** 33:17
**sit** 14:17 24:14
**Smartphones** 35:9
**Soft** 1:4 6:15 7:10 7:17 8:12 40:6 41:7 42:8
**Software** 9:14 11:13
**sort** 5:21 10:5 20:14 22:14
**sorts** 36:17
**source** 30:7,21
**speak** 8:14
**spec** 17:6 21:16 22:12,15 24:1,3 24:4,10 25:4 33:6 34:3,4,7 34:12,13,22 35:1
**specifically** 8:7 11:2 13:18 15:13
**specification** 16:3,8,15 32:15 33:22 34:14,17
**speculation** 31:12
**speed** 12:7
**spell** 5:7
**spoke** 8:8
**spoof** 31:6,16
**SSH** 31:22
**stack** 37:2,3,5
**stand** 34:5
**starting** 9:19
**state** 5:7,10 33:8
**statement** 18:15 24:22
**STATES** 1:1
**step** 23:16,17,17 23:17,17
**steps** 23:16 24:6
**Steve** 21:5
**Steven** 3:4
**straightforward** 28:2
**Street** 1:21 3:10 41:2 42:2
**strike** 24:9 29:22
**submitted** 6:5
**substantial** 16:16
**sufficient** 8:8 26:5 30:21
**Suite** 1:21 3:5,11 41:2 42:2
**summarize** 37:7
**supporting** 27:15
**sure** 8:5 11:4,16 12:18,18,20 13:9 15:8,15 20:10 22:3 23:4 24:22 25:1,22 26:12 31:14 35:21 36:1 37:1 37:3
**survive** 19:19
**survives** 20:14
**sworn** 5:2 39:10

**T**

**take** 7:3,6 19:11 27:10 38:13
**taken** 2:4 23:16 38:15 39:7
**talk** 12:21 25:11
**talked** 8:4,7
**talking** 38:6,8
**technologies** 12:13 14:19 17:2
**technology** 12:11 13:17 15:9
**telecommunica...** 16:20
**tell** 6:20 8:2,6 15:4 28:16 37:1
**term** 22:3 26:6 33:1,9,9
**tested** 10:20 11:8 11:22 12:9,17
**testified** 5:3
**testimony** 36:2,4
**testing** 10:19 12:1 13:18 16:19
**Texas** 3:18 40:4
**Thank** 8:9 38:17
**thereof** 39:13
**things** 25:20 26:3 36:17
**think** 7:6,14,20 10:21 12:8 22:14 25:5
**thought** 7:5
**thoughts** 30:11
**thousand** 25:5
**three** 6:5 23:17
**three-way** 26:11
**TikTok** 1:2 40:6 41:7 42:8
**time** 9:12,21 10:14 11:8 13:14,16,17,20 14:17 15:15 20:12 35:6,9 37:9 38:21 39:7 40:16
**times** 26:15
**title** 39:8
**today** 14:17 24:15 27:11
**told** 7:2
**topics** 9:5
**touched** 14:20
**TRADEMARK** 1:1
**training** 17:3,4,6
**transcript** 2:1 39:4 40:10,12 41:11
**transcription** 39:5 41:13,15
**transfer** 10:10,15 10:16 12:2,4,4 12:9
**transferred** 10:11
**transferring** 11:9 11:15
**translator** 38:1
**transport** 37:4
**treat** 20:10 34:19
**trick** 16:12
**TRIAL** 1:1
**true** 39:5 41:13 41:15
**trying** 11:20 12:14,16 16:11 25:2,17,18 29:1
**turning** 20:2
**two** 12:22 15:9 15:20 17:16

18:10,22 19:18 20:7,17,20 23:4 23:17 26:2
**two-way** 18:10 19:18 20:16 26:10
**TX** 3:12
**Tyler** 3:18 40:4
**types** 26:10

**U**

**undersigned** 39:3
**understand** 5:13 9:4,7 11:14 25:17,19 27:21 29:4 33:1 34:18
**understanding** 17:9 23:6 26:18
**understood** 26:7
**UNITED** 1:1
**use** 10:2 14:7,22 32:7 36:22
**UWB** 9:15 10:20 11:12,22 12:19 12:20

**V**

**v** 1:3 5:1 40:6 41:7 42:8
**vague** 25:4
**verify** 28:10
**view** 21:2 34:17

**W**

**waive** 40:14
**want** 7:2 11:3,5 18:4 25:11 27:22 28:19,20 31:13 36:1
**WAP** 37:2,3,11 37:13,19 38:1,7
**WAP-based** 35:21,21
**Washington** 1:21 41:3 42:3
**wasn't** 11:19
**way** 19:3,4 21:2 22:16 23:7 28:19
**ways** 31:17,22
**We'll** 38:19
**we're** 33:20
**web** 35:5,12,18 35:20 36:5,8,12 36:18 37:18,21 38:1,8
**website** 26:19 28:12
**went** 7:16
**weren't** 9:22
**West** 3:17 40:3
**WHEREOF** 39:14
**Wikipedia** 26:15 26:16,22 27:7 27:17 28:3,11 33:5 35:1
**wirelessly** 11:15
**witness** 4:3 11:4 17:14 18:13 20:19 21:22 25:16 27:5 30:10 31:2 34:2 34:11 38:4,19 39:9,14 40:13 41:8,19 42:9
**wondering** 25:22
**word** 20:10 21:22 32:22 34:12,13 36:2 37:15
**work** 9:11 16:18 17:7 27:1,14,15
**worked** 7:13 9:8 9:14,17,18 11:12
**working** 10:1 11:8
**works** 28:17
**written** 40:22

**X**

**X** 1:2,5,12 4:1 26:4,4

**Y**

**yeah** 5:20 7:14,15 7:22 10:9,9,10 10:15 11:4,17 12:7,14 13:3 15:4 17:4 21:16 22:5 25:6,6 26:21 28:7,12 29:6 31:8,22 32:3 33:7 35:10 37:12
**year** 11:10

**Z**

**zeros** 12:2
**Zoom** 2:8 5:14

**0**

**02210** 3:6

**1**

**1** 39:4
**10-minute** 38:14
**1019** 24:11
**119** 3:17 40:3
**1700** 3:5
**1717** 3:10
**1730** 1:21 41:2 42:2

**2**

**2.1** 9:5,9,19 10:1 16:2,8,15
**2:00** 2:9
**20036** 1:21 41:3 42:3
**2005** 9:16,18
**2007** 9:6,21 10:2 10:8,11,13,13 10:21 13:1,11 13:12,20 14:5,6 14:13 15:6,11 35:6,8,13,19 36:6,7,7,10,19 36:21 37:11
**2010** 9:13,19
**2018** 7:14,14
**202** 1:22 41:4
**202)-232-0646** 40:17
**202)232-0646** 42:4
**2024** 7:1
**2024007700** 6:5
**2025** 1:16 2:8 39:16 40:7,20 41:9 42:10
**232-0646** 1:22 41:4
**28** 1:16 2:8 40:7 41:9 42:10

**3**

**3:10** 38:21
**39** 39:5

**4**

**5**

**5** 4:7
**5000** 3:11

**6**

**7**

**75201** 3:12
**75702-7203** 3:18 40:4
**7th** 39:15

**8**

**812** 1:21 41:2 42:2