

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 -----
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD
4 -----

5 LUXOTTICA OF AMERICA INC.,

6 Petitioner,

7 vs.

8 E-VISION SMART OPTICS, INC.,

9 Patent Owner.
10 -----

11 Case IPR2024-01072

12 Patent No. 10,598,960
13 -----

14
15 Virtual Deposition of DR. JAMES OLIVER

16 Tuesday, June 17, 2025

17 10:38 a.m. CST
18

19 Job No.: 587938

20 Pages: 1 - 44

21 Reported Stenographically by:

22 Tiffany M. Pietrzyk, CSR RPR CRR

1 Virtual deposition of DR. JAMES OLIVER, pursuant
2 to notice, before Tiffany M. Pietrzyk, a Certified
3 Shorthand Reporter in the States of Illinois, Texas,
4 and California, Registered Professional Reporter,
5 Certified Realtime Reporter, and a Notary Public in
6 and for the State of Illinois.

A P P E A R A N C E S

ON BEHALF OF THE PETITIONER:

JACOB L. PETERSON, ESQUIRE

MORGAN, LEWIS & BOCKIUS LLP

Suite 2800

1301 Second Avenue

Seattle, Washington 98101

206.274.6477

ON BEHALF OF THE PATENT OWNER:

BRIAN EUTERMOSER, ESQUIRE

KING & SPALDING LLP

1401 Lawrence Street

Suite 1900

Denver, Colorado 80202

720.535.2300

ALSO PRESENT:

Crystal Alexander, Planet Depos Remote Tech

C O N T E N T S

EXAMINATION OF DR. JAMES OLIVER	PAGE
By Mr. Peterson	5

E X H I B I T S

(Attached to transcript.)

DEPOSITION EXHIBITS	PAGE
Exhibit 1001 U.S. Patent Number	14
10,598,960	
Exhibit 2014 Corrected Declaration of	10
Dr. James Oliver	

P R O C E E D I N G S

(Witness sworn.)

WHEREUPON:

DR. JAMES OLIVER,

called as a witness herein, having been first duly
sworn, was examined and testified as follows:

EXAMINATION

BY MR. PETERSON:

Q. Good morning, Dr. Oliver.

A. Good morning.

Q. Thank you again for your time. How are you
doing today?

A. I'm doing just fine. I hope you are too.

Q. Thank you. And early morning here.

We are here to discuss your testimony in IPR
2024-01072.

Is that your understanding?

A. Yes.

Q. And just to make things easier for myself,
would it be all right if I refer to this particular
IPR as "the IPR" or the shorthand "IPR"?

A. That's fine.

10:38:14

10:38:14

10:38:23

10:38:24

10:38:25

10:38:30

10:38:31

10:38:33

10:38:52

10:38:56

10:39:02

10:39:02

10:39:03

10:39:10

10:39:13

10:39:19

1	Q. The patent at issue in this case is U.S.	10:39:20
2	patent number 10,598,960. Is -- let's see. I might	10:39:24
3	use the shorthand "'960 patent."	10:39:35
4	Is that okay with you?	10:39:39
5	A. That's okay.	10:39:40
6	Q. I'm here today representing the petitioner,	10:39:41
7	Luxottica of America Inc.	10:39:46
8	Do you understand that?	10:39:48
9	A. Yes.	10:39:49
10	Q. Even though you are testifying virtually	10:39:50
11	today, do you understand that the testimony you give	10:39:56
12	is under oath and subject to the same penalty of	10:39:59
13	perjury as though you were testifying in a	10:40:02
14	courtroom?	10:40:04
15	A. I do understand that.	10:40:04
16	Q. And I believe I recognize your background at	10:40:06
17	this point. Are you in Iowa at this point?	10:40:11
18	A. I am in Ames, Iowa in my office, door	10:40:13
19	closed.	10:40:17
20	Q. And is there anyone else in the room there	10:40:17
21	with you?	10:40:20
22	A. No.	10:40:20

1 Q. And do you have any materials with you in 10:40:25
2 the room today? 10:40:26

3 A. I have a plain copy of my declaration marked 10:40:27
4 with some tabs to quickly refer to them. 10:40:29

5 Q. And do you have any other windows open on 10:40:39
6 your computer? 10:40:42

7 A. No, my laptop is clean. 10:40:43

8 Q. As we go through the questions today, I'm 10:40:48
9 going to assume that you understand the question 10:40:50
10 asked unless you tell me otherwise. 10:40:53

11 Is that okay? 10:40:56

12 A. Yes. 10:40:56

13 Q. Is there anything that would prevent you 10:40:57
14 from thinking clearly and testifying truthfully 10:41:01
15 today? 10:41:03

16 A. No. 10:41:04

17 Q. And in terms of cadence, as with the other 10:41:05
18 proceedings, we'll try to go for about an hour's 10:41:13
19 time and then take a break. But if you would like 10:41:16
20 to take a break earlier, please just let me know, 10:41:19
21 and we will be happy to accommodate that. 10:41:24

22 A. Okay. Thank you. 10:41:27

1	Q. And as a ground rule piece, have you been	10:41:28
2	informed that you are not to discuss the content of	10:41:32
3	your testimony with your counsel during the breaks?	10:41:34
4	A. Yes.	10:41:37
5	Q. In this proceeding, you have submitted a	10:41:37
6	declaration, which has been marked as Exhibit 2014.	10:41:57
7	A. Uh-huh.	10:42:00
8	Q. As we go, I will probably just use the	10:42:01
9	shorthand "your declaration."	10:42:07
10	Would that be okay with you?	10:42:10
11	A. That's fine. Thank you.	10:42:12
12	Q. And for a point of clarity as well, is it	10:42:13
13	your understanding that patent owner, E-Vision Smart	10:42:20
14	Optics, Inc., submitted two different versions of	10:42:25
15	your declaration in this IPR?	10:42:27
16	A. I believe there was a corrected version	10:42:29
17	submitted, yes.	10:42:32
18	Q. And do you know why the corrected version of	10:42:36
19	the declaration was prepared?	10:42:40
20	MR. EUTERMOSER: I'll object to the form and	10:42:42
21	instruct you not to answer to the extent you'd be	10:42:44
22	revealing communications with counsel.	10:42:47

1 Q. What are the differences between the two 10:42:56
2 versions of your declaration that you prepared for 10:42:59
3 this IPR? 10:43:00

4 A. I can't remember. I was aware of it back in 10:43:04
5 March, when -- or April -- April, I guess, when it 10:43:08
6 was resubmitted. 10:43:12

7 Q. Would it be okay if I referred to the 10:43:17
8 later-filed version of your declaration as the 10:43:20
9 "corrected declaration"? 10:43:23

10 A. Yes. 10:43:24

11 Q. And would it be okay if I referred to the 10:43:25
12 earlier-filed version of your declaration as the 10:43:28
13 "original declaration"? 10:43:30

14 A. Yes. 10:43:32

15 Q. In terms of your preparation for the 10:43:33
16 deposition today, what did you do to prepare? 10:43:42

17 A. I reviewed my declaration, the corrected 10:43:47
18 version. I also reviewed the prior art that is 10:43:50
19 referenced therein. 10:43:55

20 Q. And did you meet with counsel to prepare? 10:43:58

21 A. I did. 10:44:01

22 Q. And about how much time would you say you 10:44:01

1	spent preparing?	10:44:05
2	A. Approximately two hours on my personal	10:44:06
3	review and another two hours speaking with counsel.	10:44:11
4	Q. Was there anything you came across in your	10:44:26
5	corrected declaration that you no longer agree with	10:44:29
6	or changed your mind on?	10:44:32
7	A. No, but I did identify a couple of the	10:44:34
8	typos.	10:44:37
9	Q. Okay. Could we take a look at those now?	10:44:40
10	A. Sure.	10:44:42
11	MR. PETERSON: And could we mark	10:44:47
12	Exhibit 2014, corrected declaration, for	10:44:49
13	identification.	10:44:52
14	(Exhibit 2014 was marked for	10:44:52
15	identification and is attached to the	10:44:52
16	transcript.)	10:45:00
17	REMOTE TECHNICIAN: Stand by.	10:45:00
18	A. I see it.	10:45:09
19	Can we go to paragraph 56.	10:45:21
20	There's a reference to Exhibit 2022. It's	10:45:42
21	lower -- oh, there it is, right where your cursor	10:45:45
22	is.	10:45:49

1 Exhibit 2022 in the exhibits that were filed
2 is -- the wrong document is submitted, but the link
3 that's referenced in the table of contents relative
4 to Exhibit 2022 is correct.

5 Q. Were there any other items that you no
6 longer agree with or that you changed your mind on?

7 A. Nothing that I changed my mind on, but
8 another typo is on page 60 -- or paragraph 61. And
9 it's actually page 40. It's at the very bottom of
10 that paragraph. So keep going down. Okay. Stop.
11 Top of that paragraph. Let me see. Page 40. Yes.

12 The second line of that paragraph, it has an
13 exhibit that's indicated, Electronics Cooling
14 Article. That should actually say Exhibit 2017.

15 Q. Were there any other corrections that you
16 flagged or typos that you flagged on your review?

17 A. No.

18 Q. On the face of the -- on the face of the
19 '960 patent, Exhibit 1001, there are five
20 individuals listed.

21 Do you happen to know any of those
22 individuals?

1	A. No --	10:48:04
2	Q. Sorry. I should clarify. Inventors. I	10:48:05
3	didn't mean to cut you off, Dr. Oliver.	10:48:07
4	A. No, I do not.	10:48:08
5	Q. All right. If we could next turn to your	10:48:25
6	corrected declaration, please.	10:48:28
7	And could we please turn to the last page of	10:48:59
8	the declaration.	10:49:03
9	The signature here on this page, is that	10:49:03
10	your signature, Dr. Oliver?	10:49:06
11	A. Yes.	10:49:07
12	Q. And did you execute the last page of the	10:49:07
13	corrected declaration on March 31, 2025, after	10:49:11
14	reviewing the contents of the corrected declaration?	10:49:15
15	A. Yes.	10:49:18
16	Q. Could we please turn to paragraph 23.	10:49:18
17	In the first sentence -- in the first	10:49:44
18	sentence of paragraph 23, you say "at the time of	10:49:47
19	the invention of the '960 patent."	10:49:49
20	What do you consider the inventions of the	10:49:54
21	'960 patent?	10:49:57
22	MR. EUTERMOSER: Object to the form.	10:49:59

1 A. Essentially focused on making fashionable 10:50:04
2 eyewear with one or more application devices that 10:50:09
3 are accessible to the user. 10:50:19

4 Q. Are the application devices removably 10:50:24
5 connected to the eyewear? 10:50:28

6 MR. EUTERMOSER: Object to the form. 10:50:30

7 A. They can be. 10:50:33

8 Q. Are there any other features disclosed in 10:50:45
9 the '960 patent that you would consider to be the 10:50:48
10 inventions of the patent? 10:50:51

11 MR. EUTERMOSER: Form. 10:50:55

12 A. They're described. I summarize those below 10:50:57
13 in my declaration. Can you point me to anything in 10:51:03
14 particular you're looking for? 10:51:05

15 Q. Nothing in particular. 10:51:07

16 Could we please next turn to paragraph 49. 10:51:19
17 And could you please scroll down just a bit more, so 10:51:38
18 beginning with the very last line on page 28. 10:51:42

19 A. Uh-huh. 10:51:45

20 Q. And paragraph 49 of your corrected 10:51:45
21 declaration, you say "I note that Rosenblatt 10:51:48
22 describes a type of key that creates personal area 10:51:52

1 networks. The ability to create personal area
2 networks, such as WiFi hot spots and ad hoc
3 networks, is a feature of wireless transceivers,
4 including WiFi and Bluetooth chipsets used in
5 desktops, laptop computers, tablets, and
6 smartphones."

7 With that statement in mind, I'd like to now
8 turn to the '960 patent.

9 MR. PETERSON: Could we please mark
10 Exhibit 1001 for identification.

11 (Exhibit 1001 was marked for
12 identification and is attached to the
13 transcript.)

14 Q. Do you recognize this exhibit, Dr. Oliver?

15 A. Yes.

16 Q. And what is it?

17 A. It's the patent that we're discussing.
18 '960.

19 Q. Could we please turn to column 2, line 54.

20 I believe it will be a few pages in. Maybe
21 eight pages in. Let me see what I have here. On
22 page 21, I believe, yeah.

10:51:57

10:52:00

10:52:05

10:52:09

10:52:12

10:52:15

10:52:18

10:52:23

10:52:26

10:52:29

10:52:29

10:52:29

10:52:47

10:52:47

10:52:49

10:52:49

10:52:50

10:52:55

10:52:58

10:53:13

10:53:15

10:53:23

1	All right. So column 2, line 54.	10:53:28
2	Dr. Oliver, could you please read the	10:53:35
3	disclosure in column 2, lines 54 to 64 of the '960	10:53:37
4	patent to yourself. And then I'd like to ask you	10:53:43
5	questions about this paragraph.	10:53:47
6	A. Okay. One moment.	10:53:51
7	Okay.	10:54:10
8	Q. Column 2, lines 54 to 64 of the '960 patent	10:54:14
9	describes incorporating WiFi communication into	10:54:20
10	eyewear; correct?	10:54:24
11	MR. EUTERMOSER: Object to the form.	10:54:27
12	A. Yes.	10:54:27
13	Q. Column 2, lines 54 to 64 of the '960 patent	10:54:32
14	describes incorporating Bluetooth communication into	10:54:36
15	eyewear; correct?	10:54:39
16	MR. EUTERMOSER: Object to the form.	10:54:41
17	A. Is that the same question?	10:54:43
18	Q. The second one I intended to ask about	10:54:45
19	Bluetooth communication. I can repeat the question	10:54:50
20	if that would be helpful.	10:54:52
21	A. No, that's okay. Yes, it refers to	10:54:54
22	Bluetooth communication.	10:54:56

1	Q. Let me just repeat the question to --	10:54:58
2	A. Uh-huh.	10:55:03
3	Q. Column 2, lines 54 to 64 of the '960 patent	10:55:04
4	describes incorporating Bluetooth communication into	10:55:14
5	eyewear; correct?	10:55:17
6	MR. EUTERMOSER: Form.	10:55:18
7	A. It describes Bluetooth communication of an	10:55:19
8	electronic device; but yes, the overall patent is	10:55:25
9	related to eyewear.	10:55:28
10	Q. So would it be accurate to say that it also	10:55:35
11	discloses incorporating Bluetooth communication into	10:55:39
12	eyewear?	10:55:42
13	MR. EUTERMOSER: Form.	10:55:43
14	A. Yeah, the paragraph above refers to	10:55:45
15	operating power and recharging power from the	10:56:00
16	eyewear, so the eyewear is powering the electronic	10:56:04
17	device.	10:56:07
18	Q. The paragraph at column 2, lines 54 to 64 of	10:56:14
19	the '960 patent --	10:56:20
20	A. Uh-huh.	10:56:20
21	Q. -- described embodiments?	10:56:21
22	A. Is that a question?	10:56:30

1	Q. The question will be next here.	10:56:31
2	A. Okay.	10:56:35
3	Q. Would the embodiments described in column 2,	10:56:37
4	lines 54 to 64 of the '960 patent be capable of	10:56:41
5	creating a personal area network?	10:56:46
6	MR. EUTERMOSER: Object to the form.	10:56:53
7	A. I wouldn't characterize it that way.	10:56:53
8	Q. And why is that?	10:57:01
9	A. The electronics in a small form like eyewear	10:57:02
10	would not be able to generate a personal area	10:57:16
11	network or an ad hoc network to essentially a	10:57:19
12	receiver. Much smaller form factor and less	10:57:23
13	sophisticated electronics.	10:57:30
14	Q. Let's turn back to the corrected	10:57:33
15	declaration, please, and paragraph 47 in particular.	10:57:36
16	You say here that a POSITA -- let's first	10:57:58
17	introduce a POSITA.	10:58:03
18	A POSITA is a person of ordinary skill in	10:58:05
19	the art; is that correct?	10:58:09
20	A. Yes.	10:58:09
21	Q. And for shorthand during your discussion	10:58:10
22	today, we can use "POSITA" to refer to that concept	10:58:12

1 of a person of ordinary skill in the art? 10:58:17

2 A. Okay. 10:58:19

3 Q. Okay. So in paragraph 47 of your corrected 10:58:21

4 declaration, you say, "A POSITA would have viewed 10:58:25

5 the combination as inoperable because the teachings 10:58:28

6 of Rosenblatt relied on would result in excessive 10:58:32

7 size, weight, and power requirements to implement 10:58:38

8 them in the confines of Jannard-740 or Chen 10:58:42

9 eyewear." 10:58:46

10 What do you mean by the term operable -- 10:58:49

11 sorry -- inoperable? I'll rephrase that. 10:58:52

12 What do you mean by the term "inoperable"? 10:58:55

13 A. I mean a POSITA would recognize that the -- 10:59:00

14 the electronics and components necessary to create a 10:59:08

15 personal area network would be -- would create a 10:59:12

16 very cumbersome, heavy -- and it wouldn't be 10:59:17

17 feasible to create the device necessary to create a 10:59:26

18 personal area network within the constraints -- 10:59:32

19 size, weight, and power requirements -- that are in 10:59:38

20 these lightweight glasses. 10:59:41

21 Q. Does the term "inoperable" mean that the 10:59:58

22 laws of physics would have prevented the 11:00:01

1	combination?	11:00:04
2	MR. EUTERMOSER: Object to the form.	11:00:07
3	A. What this sentence is referring to is that	11:00:09
4	would a POSITA have even tried to create the	11:00:13
5	technology required to produce a personal -- what	11:00:17
6	did we call it -- network, would recognize that in	11:00:26
7	order to do so, it would make the goal of the	11:00:31
8	aesthetically pleasing and ergonomically comfortable	11:00:36
9	eyewear, and so they would not even try or be	11:00:43
10	motivated to try.	11:00:51
11	Q. My question is a bit more specific than	11:00:52
12	that.	11:00:55
13	Does the term "inoperable," as you used it	11:00:55
14	in paragraph 47 of your corrected declaration, mean	11:00:58
15	that the laws of physics would have prevented the	11:01:01
16	combination?	11:01:05
17	A. I don't agree with how that's framed. We're	11:01:10
18	not talking about hypothetical laws of physics here.	11:01:13
19	We're talking about technologies available at the	11:01:18
20	time of the patent would not be amenable to this	11:01:20
21	application, and a POSITA would recognize that.	11:01:23
22	Q. Does the term "inoperable," as you use it in	11:01:37

1 paragraph 47 of your corrected declaration, mean
2 that the limits on the size, weight, and power of
3 available off-the-shelf components prior to 2012
4 would have prevented the combination?

11:01:40

11:01:43

11:01:49

11:01:55

5 MR. EUTERMOSER: Object to the form.

11:01:56

6 A. A POSITA trying to design eyewear with this
7 functionality would be subject to constraints of
8 making a pleasing product that is marketable, that
9 has the desired functionality, and would recognize
10 that with the technology of the day, it would be
11 infeasible to create that functionality in a pair of
12 lightweight, comfortable eyewear.

11:01:59

11:02:03

11:02:08

11:02:14

11:02:19

11:02:23

11:02:26

13 Q. Is that infeasibility due to limits on the
14 size, weight, and power of available off-the-shelf
15 components prior to 2012?

11:02:33

11:02:37

11:02:43

16 MR. EUTERMOSER: Object to the form.

11:02:45

17 A. It would be recognized by a POSITA to be an
18 unfruitful path to take, and he would, therefore,
19 not pursue it.

11:02:48

11:02:54

11:03:00

20 Q. In your opinion, would the path have been
21 fruitful to pursue with technology in the year 2025?

11:03:12

11:03:15

22 A. I don't know.

11:03:23

1 Q. Why do you say you don't know? 11:03:30

2 A. Because I haven't kept up with the 11:03:33

3 technology of network and transceivers and all of 11:03:37

4 that, so I'm not currently aware of the state of the 11:03:43

5 art in those technologies, but I doubt it. 11:03:50

6 Q. Can we please turn to paragraph 52 of your 11:04:10

7 corrected declaration. 11:04:14

8 Actually, if we could return to paragraph 11:04:35

9 47, and I have a more general question apart from 11:04:41

10 your declaration too. 11:04:44

11 Dr. Oliver, have you ever worked on a 11:04:48

12 product design project for a U.S. military 11:04:50

13 application? 11:04:54

14 A. Not on a product, but I have evaluated 11:05:00

15 technology on behalf of the Department of Defense. 11:05:03

16 Q. Would you say that U.S. military product 11:05:08

17 design projects typically prioritize performance 11:05:11

18 over cost when it comes to component selection? 11:05:15

19 A. I have no opinion on that. 11:05:25

20 Q. Why do you have no opinion on that? 11:05:29

21 A. Well, I'll give you an example. The U.S. 11:05:32

22 Army contracted Microsoft to hundreds of millions of 11:05:36

1 dollars to explore augmented reality headsets for
2 infantry soldiers, and they had state-of-the-art
3 technology, and the project failed and they were
4 cut, and it didn't -- didn't go forward. But, you
5 know, I'm just following the news on that.

6 The military, I'm not aware of how military
7 procurement works, so I don't really have an opinion
8 on your question.

9 Q. You used the phrase "state-of-the-art
10 technology."

11 What does the phrase "state-of-the-art
12 technology" mean?

13 A. It's pretty clear to anyone in the field.

14 Can you be more specific?

15 Q. You used the phrase. I was hoping you could
16 provide some clarity on it, the meaning of the
17 phrase "state-of-the-art technology."

18 MR. EUTERMOSER: Object to the form.

19 A. Yeah, I'm -- it's obvious from the context
20 and its use. It's common in popular press, in
21 technology fields. It's, you know, the latest and
22 greatest in whatever field we're talking about.

1 Q. So the latest and greatest technology in
2 that art?

3 A. I suppose that's a way of saying it. It's a
4 pretty obvious term.

5 Q. Is it common in your understanding for U.S.
6 military product design projects to involve highly
7 specialized or custom-designed components?

8 A. Again, I don't -- I don't -- I'm not
9 involved in designing products for military
10 applications, so I'm not familiar with that field.

11 Q. Can we please turn to paragraph 55. And
12 it's actually text on the top of -- or page 34, the
13 next page. And could you please scroll up just a
14 bit so we see -- there we go. Perfect. I'm looking
15 at the sentence that ends at the very end of page
16 33.

17 And in this sentence of paragraph 55 of your
18 declaration, you say "resulting in expected minimal
19 volume of 3 to 4 cubic inches and minimal weight of
20 about 100 grams."

21 MR. EUTERMOSER: Object to the form.

22 Q. When you made the statement regarding the

1	expected minimal volume of 3 to 4 cubic inches and	11:09:12
2	minimal weight of about 100 grams, did you consider	11:09:17
3	the state-of-the-art technology at the time?	11:09:21
4	A. At the time of the '960 priority date?	11:09:30
5	Q. This sentence here discusses an expected	11:09:38
6	minimal volume and minimal weight.	11:09:43
7	Did you consider use of state-of-the-art	11:09:56
8	technology as comprising this expected minimal	11:10:07
9	volume and minimal weight?	11:10:14
10	MR. EUTERMOSER: Object to the form.	11:10:18
11	A. This estimate was based on commercially	11:10:23
12	available technologies at the time of the '960	11:10:27
13	priority date.	11:10:35
14	Q. Let's next turn to paragraph 62, please.	11:10:50
15	And I'm interested in discussing the first sentence	11:11:10
16	of paragraph 62.	11:11:12
17	A. Uh-huh.	11:11:14
18	Q. So in paragraph 62 of your corrected	11:11:16
19	declaration, you say "Chen does not offer any	11:11:19
20	meaningful discussion pertaining to the field of	11:11:24
21	electronics embedded in eyewear."	11:11:26
22	What does it mean that Chen does not offer	11:11:31

1 any meaningful discussion pertaining to the field of 11:11:34

2 electronics embedded in eyewear? 11:11:37

3 A. Chen's patent is directed toward thermal 11:11:42

4 regulation of the user via modules inserted into the 11:11:46

5 temples. There's no discussion or embodiment that 11:11:51

6 describes electronics embedded in the eyewear. 11:11:59

7 Q. Could we please now turn to paragraph 63. 11:12:13

8 In paragraph 43 of your corrected 11:12:34

9 declaration, you recite Claim 11. 11:12:38

10 What does the term "application module" 11:12:47

11 mean? 11:12:49

12 MR. EUTERMOSER: Object to the form. 11:12:54

13 A. It's -- excuse me. It's clear in the -- 11:12:57

14 that it is referring to an electronics functionality 11:13:04

15 that is enabled or being enabled in the eyewear. 11:13:10

16 Q. Should an application module include one or 11:13:16

17 more electronic devices configured to perform one or 11:13:19

18 more functions? 11:13:23

19 A. Well, there are many embodiments described 11:13:27

20 in the patent that are covered by this claim 11:13:29

21 language. 11:13:33

22 Q. So could an application module include one 11:13:39

1 or more electronic devices configured to perform one 11:13:42

2 or more functions? 11:13:45

3 MR. EUTERMOSER: Object to the form. 11:13:48

4 A. Can you repeat that question? That's kind 11:13:54

5 of confusing. 11:13:57

6 Q. Yes. 11:13:59

7 Could an application module include one or 11:14:00

8 more electronic devices configured to perform one or 11:14:03

9 more functions? 11:14:06

10 A. I'd need to refer to the patent. I think 11:14:10

11 there are dependent claims that address the various 11:14:13

12 configurations of the application module. 11:14:19

13 Q. If it would be helpful to the patent, please 11:14:22

14 do. I can repeat the question as well if that would 11:14:25

15 be helpful. 11:14:29

16 A. Yeah, one moment. I'll bring it up. 11:14:29

17 MR. PETERSON: Have we marked Exhibit 1001 11:14:41

18 for identification yet? If not, can we do that. 11:14:44

19 Oh, yes, we have. Thank you. 11:14:48

20 A. Let me get it. 11:14:51

21 Okay. In column 2, line 19 through 22, "The 11:15:33

22 application module may include one or more of an 11:15:42

1 electronic device configured to perform a function." 11:15:46

2 So ask your question again. 11:15:52

3 Q. Could an application module include one or 11:15:56

4 more electronic devices configured to perform one or 11:16:00

5 more functions? 11:16:03

6 A. The -- this portion of the patent describes 11:16:07

7 it's configured to perform a function, but the first 11:16:13

8 part of your question is correct. 11:16:15

9 Q. Would a removable electronic device that 11:16:20

10 connects to a docking station in eyewear be an 11:16:24

11 application module? 11:16:26

12 MR. EUTERMOSER: Object to the form. 11:16:30

13 A. Yeah, repeat that, please. 11:16:31

14 Q. Would a removable electronic device that 11:16:33

15 connects to a docking station in eyewear be an 11:16:37

16 application module? 11:16:41

17 A. Well, it doesn't have to be removable, if 11:16:45

18 that's what you're referring to. 11:16:47

19 Q. Yeah, my question was just more general. 11:16:51

20 Could it be an application module? 11:16:54

21 So based on your answer, would it be 11:16:57

22 accurate to say that a removable electronic device 11:16:59

1 that connects to a docking station in eyewear could, 11:17:02

2 indeed, be an application module? 11:17:05

3 MR. EUTERMOSER: Object to the form. 11:17:08

4 A. I guess -- I would agree with that. 11:17:10

5 Q. Could we please -- actually, it's on the 11:17:21

6 screen already. 11:17:25

7 In paragraph 43 of your declaration -- 11:17:28

8 A. Uh-huh. 11:17:30

9 Q. -- in Claim 11 of the '960 patent, one of 11:17:31

10 the claim elements is a wireless-enabled device. 11:17:36

11 Is the wireless-enabled device a component 11:17:42

12 of the eyewear? 11:17:45

13 MR. EUTERMOSER: Object to the form. 11:17:49

14 A. It could be. It doesn't have to be. 11:18:00

15 Q. Is there anything in Claim 1 -- sorry. 11:18:17

16 Rephrase. 11:18:20

17 Is there anything in Claim 11 of the '960 11:18:21

18 patent, in your opinion, that would prevent the 11:18:26

19 eyewear from functioning regardless of the presence 11:18:29

20 or absence of the wireless-enabled device? 11:18:33

21 MR. EUTERMOSER: Object to the form. 11:18:38

22 A. Didn't quite follow that again. So would -- 11:18:45

1 go ahead. Repeat. 11:18:47

2 Q. Is there anything in Claim 11 of the '960 11:18:50

3 patent that would prevent the eyewear from 11:18:54

4 functioning regardless of the presence or absence of 11:18:58

5 the wireless-enabled device? 11:19:02

6 MR. EUTERMOSER: Object to the form. 11:19:05

7 A. Well, the claim reads as it reads. The 11:19:09

8 application module including a wireless chip to 11:19:12

9 communicate with a wireless-enabled device. That's 11:19:14

10 clear in the claim language. So without a 11:19:17

11 wireless -- again, the wireless chip is enumerated 11:19:23

12 in the claim language. 11:19:27

13 Q. If the wireless-enabled device were not 11:19:38

14 present, would the eyewear of Claim 11 of the '960 11:19:41

15 patent continue functioning normally? 11:19:46

16 MR. EUTERMOSER: Form. 11:20:00

17 A. So without the wireless-enabled device? The 11:20:06

18 wire -- again, in the claim language, the 11:20:24

19 wireless-enabled device is configured to recognize 11:20:27

20 the presence of the wearer of the eyewear based, at 11:20:29

21 least in part, on communication with the wireless 11:20:32

22 chip. So the claim language clearly describes the 11:20:35

1 functionality that's being limited here. And 11:20:45
2 without the wirelessly enabled device, I -- it's -- 11:20:51
3 it's specifically enumerated in the claim. And if I 11:21:00
4 were reading this as an inventor, I would say that 11:21:08
5 it's clearly defined that we're talking about 11:21:14
6 communication between the application module and a 11:21:17
7 wirelessly enabled device that is serving a purpose. 11:21:23
8 Claim language is clear. 11:21:29

9 Q. In the eyewear of Claim 11 -- 11:21:35

10 A. Uh-huh. 11:21:38

11 Q. -- is there anything that would prevent the 11:21:39
12 eyewear from functioning normally if the 11:21:41
13 wireless-enabled device were not present? 11:21:47

14 A. It's a hypothetical. It's irrelevant. It's 11:21:51
15 clear from the claim language of what this claim is 11:21:54
16 staking. It's communication between two things. So 11:21:59
17 I won't opine on, you know, you know, a what-if 11:22:06
18 question. It's very clear from the claim language 11:22:11
19 what's going on. 11:22:14

20 Q. What I'm specifically curious about is how 11:22:23
21 you understand the feature of recognizing the 11:22:26
22 presence of the wearer -- 11:22:33

1 A. Uh-huh. 11:22:34

2 Q. -- to relate to the eyewear. So my reading 11:22:34
3 of the claim now is that the eyewear comprises an 11:22:43
4 eyewear frame and an application module, and then 11:22:46
5 the application module includes a wireless chip that 11:22:50
6 communicates with the wireless-enabled device. But 11:22:53
7 I'm curious how recognizing the presence of the 11:22:59
8 wearer of eyewear relates to the eyewear frame and 11:23:03
9 application module of the eyewear of Claim 11. 11:23:09

10 A. Again, clear. How it relates is wireless 11:23:18
11 communication between the eyewear and the wirelessly 11:23:23
12 enabled device. 11:23:26

13 Q. In your opinion, does the fact that the 11:23:43
14 wireless-enabled device is configured to recognize a 11:23:47
15 presence of a wearer of the eyewear based, at least 11:23:50
16 in part, on the communication with the wireless chip 11:23:55
17 place any functional or structural limitations on 11:23:58
18 the eyewear itself? 11:24:01

19 MR. EUTERMOSER: Object to the form. 11:24:03

20 A. The only constraint enumerated in the claim 11:24:11
21 is that the application module must have a wireless 11:24:14
22 chip to enable communication. 11:24:18

1	Q. Can we please turn to paragraph 45.	11:24:29
2	In paragraph 45 here of your corrected	11:24:43
3	declaration, you recite Claim 22.	11:24:46
4	In Claim 22 of the '960 patent, is the	11:24:49
5	computer a component of the eyewear?	11:24:52
6	A. Let me read it. Just a moment.	11:25:01
7	MR. EUTERMOSER: Object to the form.	11:25:14
8	A. Yeah, ask again, please.	11:25:15
9	Q. In Claim 22 of the '960 patent, is the	11:25:20
10	computer a component of the eyewear?	11:25:24
11	MR. EUTERMOSER: Form.	11:25:27
12	A. Excuse me. I wouldn't characterize it that	11:25:32
13	way.	11:25:38
14	Q. In Claim 22, is the computer permitted to be	11:25:47
15	separate from the eyewear?	11:25:50
16	A. Since it's not specified, I would say yes.	11:25:57
17	Q. Is there anything in Claim 22 that would	11:26:10
18	prevent the eyewear from functioning regardless of	11:26:13
19	the presence or absence of the computer?	11:26:17
20	A. Again, clear claim language. It's part of	11:26:21
21	the claim. So it's a hypothetical that doesn't make	11:26:24
22	any sense.	11:26:28

1 Q. In your opinion, does the inclusion of the
2 computer in Claim 22 --

3 A. Uh-huh.

4 Q. -- place any functional or structural
5 limitations on the eyewear itself?

6 MR. EUTERMOSER: Object to the form.

7 A. Functional or -- can you repeat that again?
8 Functional or?

9 Q. Does the inclusion of the computer in
10 Claim 22 --

11 A. Uh-huh.

12 Q. -- place any functional or structural
13 limitations on the eyewear itself?

14 MR. EUTERMOSER: Form.

15 A. Well, the claim language is clear that the
16 purpose is to transmit a password from the
17 application module to the computer to access the
18 computer. So the computer -- functional or --
19 repeat again? It's a strange question.

20 Q. Does the inclusion of the computer in
21 Claim 22 place any functional or structural
22 limitations on the eyewear itself?

11:26:41

11:26:45

11:26:48

11:26:49

11:26:53

11:26:56

11:27:02

11:27:06

11:27:11

11:27:13

11:27:14

11:27:15

11:27:17

11:27:23

11:27:28

11:27:33

11:27:38

11:27:43

11:27:52

11:27:56

11:27:59

11:28:02

1	MR. EUTERMOSER: Object to the form.	11:28:06
2	A. Yeah, the claim language is clear. Again,	11:28:12
3	it's describing the relationship between the eyewear	11:28:15
4	and a device that is handling the authentication of	11:28:19
5	an eyewear user to a computer. So does it -- so	11:28:30
6	it's just clear from the language. So it's a	11:28:38
7	strange question. I don't quite follow.	11:28:41
8	Q. Could we please turn to Exhibit 1001, and in	11:28:47
9	particular, column 3, line 67. And the sentence I'd	11:28:52
10	like to discuss actually spans across column 3 and 4	11:29:07
11	so we'll need to take it in steps.	11:29:11
12	A. Okay.	11:29:13
13	Q. So it's from column 3, line 67, to column 4,	11:29:14
14	line 2.	11:29:19
15	A. Uh-huh.	11:29:19
16	Q. This sentence recites, "The lens may have	11:29:24
17	built-in display functions that can be controlled by	11:29:28
18	the electronic device, such as with virtual or	11:29:32
19	augmented reality, or gaming."	11:29:35
20	Do you see that?	11:29:38
21	A. I do.	11:29:39
22	Q. Would turning on virtual or	11:29:39

1	augmented-reality functions typically involve	11:29:46
2	activating visual elements within the lens display?	11:29:49
3	A. Yes.	11:29:56
4	Q. Would you agree that activating those visual	11:29:56
5	elements generally requires some level of	11:30:02
6	illumination to render the visual elements visible	11:30:06
7	to the user?	11:30:10
8	A. Yes, I would agree with that.	11:30:12
9	Q. Would you agree that turning on virtual or	11:30:17
10	augmented-reality functions in the lens would cause	11:30:22
11	a change in the lens's illumination characteristics?	11:30:26
12	MR. EUTERMOSER: Object to the form. Also	11:30:32
13	the relevance.	11:30:33
14	A. Illumination characteristics, unclear on.	11:30:37
15	It depends on whether it's virtual or augmented	11:30:42
16	reality. Virtual reality generally implies that the	11:30:45
17	natural visual is completely occluded and generated	11:30:49
18	by computer graphics. Augmented reality is a	11:30:54
19	combination of natural visual input and	11:30:58
20	computer-generated content.	11:31:02
21	Q. Could we please next turn to the last page	11:31:11
22	of the '960 patent.	11:31:14

1 Looking at Claim 19, Claim 19 of the '960 11:31:23
2 patent recites "wherein the wireless-enabled device 11:31:29
3 is configured to control a functionality of the 11:31:33
4 automobile to awake the wearer should the wearer 11:31:36
5 fall asleep." 11:31:40

6 Could you please identify where in the '960 11:31:44
7 patent any details are disclosed about how a wearer 11:31:47
8 is woken if they fall asleep? 11:31:51

9 MR. EUTERMOSER: Objection. Form, 11:31:54
10 relevance, and scope. 11:31:56

11 A. It may take me a while to find references to 11:32:00
12 that functionality, but I certainly am willing to do 11:32:04
13 it. 11:32:09

14 Q. Okay. Great. Please do. Thank you. 11:32:09

15 A. Okay. Column 19, lines 44 through 50. "In 11:32:40
16 another embodiment of the invention, the wearer of 11:32:50
17 the wirelessly enabled eyewear enters his or her 11:32:53
18 automobile and the remote wireless-enabled device 11:32:56
19 located within the automobile can, by way of 11:33:01
20 example, only do one or more of the following: 11:33:03
21 Adjust the seat, radio, temperature, limit maximum 11:33:06
22 speed, awake wearer should wearer fall asleep." 11:33:09

1 Q. So in those lines you just read, are any 11:33:20
2 details disclosed about how a wearer is woken if 11:33:23
3 they fall asleep? 11:33:27

4 MR. EUTERMOSER: Objection. Form, 11:33:29
5 relevance, outside the scope of his direct. 11:33:33

6 A. I'd have to look for additional, but it goes 11:33:35
7 on it describe other -- other embodiments at that 11:33:39
8 point. 11:33:42

9 Q. At least with reference to column 19, lines 11:33:51
10 44 through 50, would you agree that there are not 11:33:55
11 any details disclosed about how a wearer is woken if 11:34:01
12 they fall asleep? 11:34:05

13 MR. EUTERMOSER: Same objections. Jacob, I 11:34:06
14 get that you're fishing for admissions relevant to 11:34:09
15 the district court case, but none of this is 11:34:12
16 anything he's opined on. 11:34:15

17 A. Lights. Just a moment. There we go. 11:34:20

18 Q. Would it be helpful if I repeated the 11:34:33
19 question? 11:34:36

20 A. Oh, yes. I'm sorry. Yeah, go ahead. 11:34:36

21 Q. At least with reference to column 19, lines 11:34:39
22 44 through 50, would you agree that there are not 11:34:42

1 any details disclosed about how a wearer is woken if 11:34:45
2 they fall asleep? 11:34:49

3 MR. EUTERMOSER: Same objections. 11:34:50

4 A. Okay. I -- my expert opinion would be a 11:34:52
5 POSITA, reading this patent, would recognize there's 11:34:58
6 any number of ways to accomplish that functionality 11:35:01
7 with various electronic modules. One could be a 11:35:04
8 vibration module that could actuate when the user 11:35:09
9 nods their head like you're falling asleep. There's 11:35:12
10 any number of ways you could accomplish that 11:35:16
11 functionality based on the descriptions in this 11:35:20
12 patent. 11:35:22

13 MR. PETERSON: I think we've been going for 11:35:26
14 around an hour now. Would you like to take a break 11:35:27
15 now, Dr. Oliver, or should we keep going for a bit 11:35:30
16 longer? 11:35:34

17 THE WITNESS: I could use a break. 11:35:34

18 MR. PETERSON: Five minutes, ten minutes? 11:35:36

19 THE WITNESS: Five minutes is fine. 11:35:38

20 (A short break was had.) 11:35:44

21 BY MR. PETERSON: 11:42:24

22 Q. Could we please turn to Claim 25. It's on 11:42:25

1 the very last page of Exhibit 1001. Down on the

11:42:28

2 page just a bit from there. Perfect. Thank you.

11:42:43

3 Claim 25 of the '960 patent recites "wherein
4 the wireless-enabled device is configured to adjust
5 a font size of an application in the computer."

11:42:45

11:42:51

11:42:54

6 Can you please identify where in the '960
7 patent any details are disclosed about how to adjust
8 the font size of an application?

11:43:00

11:43:02

11:43:07

9 MR. EUTERMOSER: Objection. Form,
10 relevance, outside the scope of direct.

11:43:09

11:43:15

11 A. Can you point me to my declaration where I'm
12 addressing that? I don't believe I did.

11:43:17

11:43:20

13 Q. Page 45.

11:43:34

14 A. Uh-huh.

11:43:35

15 Q. Sorry. Page 50, I mean. On page 50, you
16 address Claim 25.

11:43:36

11:43:52

17 A. Uh-huh.

11:43:53

18 Q. And I'm curious if you can identify where in
19 the '960 patent any details are disclosed about how
20 to adjust the font size of an application according
21 to the '960 patent.

11:43:55

11:43:58

11:44:03

11:44:06

22 MR. EUTERMOSER: Same objections.

11:44:08

1 A. Yeah, I'm not -- I'm just pointing out here 11:44:18
2 that the combination of Neilsen and the Jannard and 11:44:23
3 Chen are not obvious because of the rationale that I 11:44:34
4 describe there. So it's a, you know, completely 11:44:38
5 different field, this Neilsen patent, back from the 11:44:43
6 early '90s, when people were worrying about style 11:44:50
7 sheets, et cetera. There's any number of ways to 11:44:54
8 accomplish that, the font adjustment. And a POSITA 11:44:58
9 would not have been motivated by Neilsen to combine 11:45:03
10 it with these other -- other references. 11:45:07

11 Q. I have a follow-up question on the corrected 11:45:21
12 declaration. 11:45:24

13 When did you learn about the specific 11:45:26
14 correction that led you to prepare the corrected 11:45:28
15 declaration? 11:45:31

16 A. I don't remember. It was three months ago. 11:45:34

17 Q. Was it days after the original declaration 11:45:39
18 was filed that you learned about the specific 11:45:42
19 correction? 11:45:46

20 A. I -- I just don't remember the specific 11:45:48
21 date. 11:45:51

22 Q. Did you sign your original declaration and 11:45:55

1 your corrected declaration on the same day? 11:45:58

2 A. Again, I don't remember the dates, but I 11:46:02

3 signed both documents. 11:46:05

4 Q. Does it sound possible that you signed your 11:46:09

5 original declaration and the corrected declaration 11:46:13

6 on the same day? 11:46:15

7 A. It's certainly possible. 11:46:16

8 Q. If you signed both declarations on the same 11:46:23

9 day, do you have an understanding why your team 11:46:26

10 filed the original declaration and not the corrected 11:46:31

11 declaration -- 11:46:34

12 MR. EUTERMOSER: Object to the form -- 11:46:37

13 (Crosstalk.) 11:46:37

14 (Reporter clarification.) 11:46:37

15 MR. EUTERMOSER: Objection to the form and 11:46:47

16 instruction not to answer. 11:46:48

17 MR. PETERSON: Brian, could you please 11:46:53

18 clarify your reason for instructing him not to 11:46:54

19 answer? 11:46:56

20 MR. EUTERMOSER: Work product. And as you 11:46:57

21 know, Jacob, we've already disclosed to you that it 11:47:11

22 was a clerical error on our part, not his. So 11:47:14

1 there's no relevance to that question anyway. 11:47:18

2 MR. PETERSON: I'm just trying to understand 11:47:20

3 why the execution date on both documents is the same 11:47:22

4 and how that would have been possible because I 11:47:24

5 don't believe the corrected declaration would have 11:47:27

6 been in existence on the day that it was signed. 11:47:29

7 MR. EUTERMOSER: Well, we represented to you 11:47:34

8 that the only change in the declaration was the 11:47:36

9 exhibit numbers. You really want to go down this 11:47:38

10 road, you can if you don't invade work product, but 11:47:42

11 it's a waste of your time. 11:47:44

12 MR. PETERSON: All right. 11:47:46

13 No further questions on our end. 11:47:48

14 MR. EUTERMOSER: Nothing from me. 11:47:52

15 We can go off the record. 11:47:53

16 (Off the record at 11:47 a.m.)

17

18

19

20

21

22

1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2
3 I, TIFFANY M. PIETRZYK, Certified Shorthand
4 Reporter No. 084-004371, CSR, RPR, CRR, and a Notary
5 Public within and for the State of Illinois, do
6 hereby certify:

7
8 That DR. JAMES OLIVER, the witness whose
9 deposition is hereinbefore set forth, was duly sworn
10 by me before the commencement of such deposition and
11 that such deposition was taken before me and is a
12 true record of the testimony given by such witness.

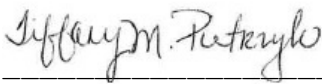
13
14 I further certify that the adverse party,
15 E-VISION SMART OPTICS, INC., was represented by
16 counsel at the deposition.

17
18 I further certify that the deposition of
19 DR. JAMES OLIVER occurred virtually, via Zoom
20 videoconference, on Tuesday June 17, 2025,
21 commencing at 10:38 a.m. CST to 11:47 a.m. CST.
22

1 I further certify that I am not related to
2 any of the parties to this action by blood or
3 marriage, I am not employed by or an attorney to any
4 of the parties to this action, and that I am in no
5 way interested, financially or otherwise, in the
6 outcome of this matter.

7
8 IN WITNESS WHEREOF, I have hereunto set my
9 hand and affixed my notarial seal this 18th day of
10 June, 2025.

11
12 My commission expires: February 28th, 2028

13
14 

15 NOTARY PUBLIC IN AND FOR THE
16 STATE OF ILLINOIS

A			
ability	additional	16:10, 35:12	30:6, 31:4,
14:1	37:6	amenable	31:5, 31:9,
able	address	19:20	31:21, 33:17,
17:10	26:11, 39:16	america	39:5, 39:8,
about	addressing	1:5, 6:7	39:20
7:18, 9:22,	39:12	ames	applications
15:5, 15:18,	adjust	6:18	23:10
19:18, 19:19,	36:21, 39:4,	another	approximately
22:22, 23:20,	39:7, 39:20	10:3, 11:8,	10:2
24:2, 30:5,	adjustment	36:16	april
30:20, 36:7,	40:8	answer	9:5
37:2, 37:11,	admissions	8:21, 27:21,	area
38:1, 39:7,	37:14	41:16, 41:19	13:22, 14:1,
39:19, 40:6,	adverse	any	17:5, 17:10,
40:13, 40:18	43:14	7:1, 7:5, 11:5,	18:15, 18:18
above	aesthetically	11:15, 11:21,	army
16:14	19:8	13:8, 24:19,	21:22
absence	affixed	25:1, 31:17,	around
28:20, 29:4,	44:9	32:22, 33:4,	38:14
32:19	after	33:12, 33:21,	art
access	12:13, 40:17	36:7, 37:1,	9:18, 17:19,
33:17	again	37:11, 38:1,	18:1, 21:5, 23:2
accessible	5:11, 23:8,	38:6, 38:10,	article
13:3	27:2, 28:22,	39:7, 39:19,	11:14
accommodate	29:11, 29:18,	40:7, 44:2, 44:3	asked
7:21	31:10, 32:8,	anyone	7:10
accomplish	32:20, 33:7,	6:20, 22:13	asleep
38:6, 38:10,	33:19, 34:2,	anything	36:5, 36:8,
40:8	41:2	7:13, 10:4,	36:22, 37:3,
according	ago	13:13, 28:15,	37:12, 38:2,
39:20	40:16	28:17, 29:2,	38:9
accurate	agree	30:11, 32:17,	assume
16:10, 27:22	10:5, 11:6,	37:16	7:9
across	19:17, 28:4,	anyway	attached
10:4, 34:10	35:4, 35:8,	42:1	4:6, 10:15,
action	35:9, 37:10,	apart	14:12
44:2, 44:4	37:22	21:9	attorney
activating	ahead	appeal	44:3
35:2, 35:4	29:1, 37:20	1:3	augmented
actually	alexander	application	22:1, 34:19,
11:9, 11:14,	3:19	13:2, 13:4,	35:15, 35:18
21:8, 23:12,	all	19:21, 21:13,	augmented-reality
28:5, 34:10	5:20, 12:5,	25:10, 25:16,	35:1, 35:10
actuate	15:1, 21:3,	25:22, 26:7,	authentication
38:8	42:12	26:12, 26:22,	34:4
ad	already	27:3, 27:11,	automobile
14:2, 17:11	28:6, 41:21	27:16, 27:20,	36:4, 36:18,
	also	28:2, 29:8,	36:19
	3:18, 9:18,		

available 19:19, 20:3, 20:14, 24:12 avenue 3:6 awake 36:4, 36:22 aware 9:4, 21:4, 22:6 B back 9:4, 17:14, 40:5 background 6:16 based 24:11, 27:21, 29:20, 31:15, 38:11 because 18:5, 21:2, 40:3, 42:4 been 5:5, 8:1, 8:6, 20:20, 38:13, 40:9, 42:4, 42:6 before 1:3, 2:2, 43:10, 43:11 beginning 13:18 behalf 3:2, 3:10, 21:15 being 25:15, 30:1 believe 6:16, 8:16, 14:20, 14:22, 39:12, 42:5 below 13:12 between 9:1, 30:6, 30:16, 31:11, 34:3 bit 13:17, 19:11,	23:14, 38:15, 39:2 blood 44:2 bluetooth 14:4, 15:14, 15:19, 15:22, 16:4, 16:7, 16:11 board 1:3 bockius 3:4 both 41:3, 41:8, 42:3 bottom 11:9 break 7:19, 7:20, 38:14, 38:17, 38:20 breaks 8:3 brian 3:11, 41:17 bring 26:16 built-in 34:17 C cadence 7:17 california 2:4 call 19:6 called 5:5 came 10:4 can't 9:4 capable 17:4 case 1:11, 6:1,	37:15 cause 35:10 certainly 36:12, 41:7 certificate 43:1 certified 2:2, 2:5, 43:3 certify 43:6, 43:14, 43:18, 44:1 cetera 40:7 change 35:11, 42:8 changed 10:6, 11:6, 11:7 characteristics 35:11, 35:14 characterize 17:7, 32:12 chen 18:8, 24:19, 24:22, 40:3 chen's 25:3 chip 29:8, 29:11, 29:22, 31:5, 31:16, 31:22 chipsets 14:4 claim 25:9, 25:20, 28:9, 28:10, 28:15, 28:17, 29:2, 29:7, 29:10, 29:12, 29:14, 29:18, 29:22, 30:3, 30:8, 30:9, 30:15, 30:18, 31:3, 31:9, 31:20, 32:3, 32:4, 32:9, 32:14, 32:17,	32:20, 32:21, 33:2, 33:10, 33:15, 33:21, 34:2, 36:1, 38:22, 39:3, 39:16 claims 26:11 clarification 41:14 clarify 12:2, 41:18 clarity 8:12, 22:16 clean 7:7 clear 22:13, 25:13, 29:10, 30:8, 30:15, 30:18, 31:10, 32:20, 33:15, 34:2, 34:6 clearly 7:14, 29:22, 30:5 clerical 41:22 closed 6:19 colorado 3:15 column 14:19, 15:1, 15:3, 15:8, 15:13, 16:3, 16:18, 17:3, 26:21, 34:9, 34:10, 34:13, 36:15, 37:9, 37:21 combination 18:5, 19:1, 19:16, 20:4, 35:19, 40:2 combine 40:9 comes 21:18
---	---	--	---

comfortable 19:8, 20:12 commencement 43:10 commencing 43:21 commercially 24:11 commission 44:12 common 22:20, 23:5 communicate 29:9 communicates 31:6 communication 15:9, 15:14, 15:19, 15:22, 16:4, 16:7, 16:11, 29:21, 30:6, 30:16, 31:11, 31:16, 31:22 communications 8:22 completely 35:17, 40:4 component 21:18, 28:11, 32:5, 32:10 components 18:14, 20:3, 20:15, 23:7 comprises 31:3 comprising 24:8 computer 7:6, 32:5, 32:10, 32:14, 32:19, 33:2, 33:9, 33:17, 33:18, 33:20, 34:5, 35:18, 39:5 computer-generat- ed 35:20	computers 14:5 concept 17:22 configurations 26:12 configured 25:17, 26:1, 26:8, 27:1, 27:4, 27:7, 29:19, 31:14, 36:3, 39:4 confines 18:8 confusing 26:5 connected 13:5 connects 27:10, 27:15, 28:1 consider 12:20, 13:9, 24:2, 24:7 constraint 31:20 constraints 18:18, 20:7 content 8:2, 35:20 contents 11:3, 12:14 context 22:19 continue 29:15 contracted 21:22 control 36:3 controlled 34:17 cooling 11:13 copy 7:3 correct 11:4, 15:10,	15:15, 16:5, 17:19, 27:8 corrected 4:10, 8:16, 8:18, 9:9, 9:17, 10:5, 10:12, 12:6, 12:13, 12:14, 13:20, 17:14, 18:3, 19:14, 20:1, 21:7, 24:18, 25:8, 32:2, 40:11, 40:14, 41:1, 41:5, 41:10, 42:5 correction 40:14, 40:19 corrections 11:15 cost 21:18 could 10:9, 10:11, 12:5, 12:7, 12:16, 13:16, 13:17, 14:9, 14:19, 15:2, 21:8, 22:15, 23:13, 25:7, 25:22, 26:7, 27:3, 27:20, 28:1, 28:5, 28:14, 34:8, 35:21, 36:6, 38:7, 38:8, 38:10, 38:17, 38:22, 41:17 counsel 8:3, 8:22, 9:20, 10:3, 43:16 couple 10:7 court 37:15, 43:1 courtroom 6:14 covered 25:20	create 14:1, 18:14, 18:15, 18:17, 19:4, 20:11 creates 13:22 creating 17:5 crosstalk 41:13 crr 1:22, 43:4 crystal 3:19 csr 1:22, 43:4 cst 1:17, 43:21 cubic 23:19, 24:1 cumbersome 18:16 curious 30:20, 31:7, 39:18 currently 21:4 cursor 10:21 custom-designed 23:7 cut 12:3, 22:4 D date 24:4, 24:13, 40:21, 42:3 dates 41:2 day 20:10, 41:1, 41:6, 41:9, 42:6, 44:9 days 40:17 declaration 4:10, 7:3, 8:6,
--	--	--	--

8:9, 8:15, 8:19, 9:2, 9:8, 9:9, 9:12, 9:13, 9:17, 10:5, 10:12, 12:6, 12:8, 12:13, 12:14, 13:13, 13:21, 17:15, 18:4, 19:14, 20:1, 21:7, 21:10, 23:18, 24:19, 25:9, 28:7, 32:3, 39:11, 40:12, 40:15, 40:17, 40:22, 41:1, 41:5, 41:10, 41:11, 42:5, 42:8 declarations 41:8 defense 21:15 defined 30:5 denver 3:15 department 21:15 dependent 26:11 depends 35:15 depos 3:19 deposition 1:15, 2:1, 4:7, 9:16, 43:9, 43:10, 43:11, 43:16, 43:18 describe 37:7, 40:4 described 13:12, 16:21, 17:3, 25:19 describes 13:22, 15:9, 15:14, 16:4,	16:7, 25:6, 27:6, 29:22 describing 34:3 descriptions 38:11 design 20:6, 21:12, 21:17, 23:6 designing 23:9 desired 20:9 desktops 14:5 details 36:7, 37:2, 37:11, 38:1, 39:7, 39:19 device 16:8, 16:17, 18:17, 27:1, 27:9, 27:14, 27:22, 28:10, 28:11, 28:20, 29:5, 29:9, 29:13, 29:17, 29:19, 30:2, 30:7, 30:13, 31:6, 31:12, 31:14, 34:4, 34:18, 36:2, 36:18, 39:4 devices 13:2, 13:4, 25:17, 26:1, 26:8, 27:4 differences 9:1 different 8:14, 40:5 direct 37:5, 39:10 directed 25:3 disclosed 13:8, 36:7, 37:2, 37:11,	38:1, 39:7, 39:19, 41:21 discloses 16:11 disclosure 15:3 discuss 5:15, 8:2, 34:10 discusses 24:5 discussing 14:17, 24:15 discussion 17:21, 24:20, 25:1, 25:5 display 34:17, 35:2 district 37:15 docking 27:10, 27:15, 28:1 document 11:2 documents 41:3, 42:3 doing 5:12, 5:13 dollars 22:1 door 6:18 doubt 21:5 down 11:10, 13:17, 39:1, 42:9 dr 1:15, 2:1, 4:2, 4:11, 5:4, 5:9, 12:3, 12:10, 14:14, 15:2, 21:11, 38:15, 43:8, 43:19 due 20:13 duly 5:5, 43:9	during 8:3, 17:21 E e-vision 1:8, 8:13, 43:15 earlier 7:20 earlier-filed 9:12 early 5:14, 40:6 easier 5:19 eight 14:21 electronic 16:8, 16:16, 25:17, 26:1, 26:8, 27:1, 27:4, 27:9, 27:14, 27:22, 34:18, 38:7 electronics 11:13, 17:9, 17:13, 18:14, 24:21, 25:2, 25:6, 25:14 elements 28:10, 35:2, 35:5, 35:6 else 6:20 embedded 24:21, 25:2, 25:6 embodiment 25:5, 36:16 embodiments 16:21, 17:3, 25:19, 37:7 employed 44:3 enable 31:22 enabled 25:15, 30:2,
---	--	---	--

Transcript of James Oliver, Ph.D.
Conducted on June 17, 2025

49

30:7, 31:12, 36:17 end 23:15, 42:13 ends 23:15 enters 36:17 enumerated 29:11, 30:3, 31:20 ergonomically 19:8 error 41:22 esquire 3:3, 3:11 essentially 13:1, 17:11 estimate 24:11 et 40:7 eutermoser 3:11, 8:20, 12:22, 13:6, 13:11, 15:11, 15:16, 16:6, 16:13, 17:6, 19:2, 20:5, 20:16, 22:18, 23:21, 24:10, 25:12, 26:3, 27:12, 28:3, 28:13, 28:21, 29:6, 29:16, 31:19, 32:7, 32:11, 33:6, 33:14, 34:1, 35:12, 36:9, 37:4, 37:13, 38:3, 39:9, 39:22, 41:12, 41:15, 41:20, 42:7, 42:14 evaluated 21:14 even 6:10, 19:4,	19:9 ever 21:11 examination 4:2, 5:7 examined 5:6 example 21:21, 36:20 excessive 18:6 excuse 25:13, 32:12 execute 12:12 execution 42:3 exhibit 4:8, 4:10, 8:6, 10:12, 10:14, 10:20, 11:1, 11:4, 11:13, 11:14, 11:19, 14:10, 14:11, 14:14, 26:17, 34:8, 39:1, 42:9 exhibits 4:7, 11:1 existence 42:6 expected 23:18, 24:1, 24:5, 24:8 expert 38:4 expires 44:12 explore 22:1 extent 8:21 eyewear 13:2, 13:5, 15:10, 15:15, 16:5, 16:9, 16:12, 16:16, 17:9, 18:9, 19:9, 20:6,	20:12, 24:21, 25:2, 25:6, 25:15, 27:10, 27:15, 28:1, 28:12, 28:19, 29:3, 29:14, 29:20, 30:9, 30:12, 31:2, 31:3, 31:4, 31:8, 31:9, 31:11, 31:15, 31:18, 32:5, 32:10, 32:15, 32:18, 33:5, 33:13, 33:22, 34:3, 34:5, 36:17 F face 11:18 fact 31:13 factor 17:12 failed 22:3 fall 36:5, 36:8, 36:22, 37:3, 37:12, 38:2 falling 38:9 familiar 23:10 fashionable 13:1 feasible 18:17 feature 14:3, 30:21 features 13:8 february 44:12 few 14:20 field 22:13, 22:22,	23:10, 24:20, 25:1, 40:5 fields 22:21 filed 11:1, 40:18, 41:10 financially 44:5 find 36:11 fine 5:13, 5:22, 8:11, 38:19 first 5:5, 12:17, 17:16, 24:15, 27:7 fishing 37:14 five 11:19, 38:18, 38:19 flagged 11:16 focused 13:1 follow 28:22, 34:7 follow-up 40:11 following 22:5, 36:20 follows 5:6 font 39:5, 39:8, 39:20, 40:8 form 8:20, 12:22, 13:6, 13:11, 15:11, 15:16, 16:6, 16:13, 17:6, 17:9, 17:12, 19:2, 20:5, 20:16, 22:18, 23:21, 24:10, 25:12,
---	---	---	---

26:3, 27:12, 28:3, 28:13, 28:21, 29:6, 29:16, 31:19, 32:7, 32:11, 33:6, 33:14, 34:1, 35:12, 36:9, 37:4, 39:9, 41:12, 41:15 forth 43:9 forward 22:4 frame 31:4, 31:8 framed 19:17 fruitful 20:21 function 27:1, 27:7 functional 31:17, 33:4, 33:7, 33:8, 33:12, 33:18, 33:21 functionality 20:7, 20:9, 20:11, 25:14, 30:1, 36:3, 36:12, 38:6, 38:11 functioning 28:19, 29:4, 29:15, 30:12, 32:18 functions 25:18, 26:2, 26:9, 27:5, 34:17, 35:1, 35:10 further 42:13, 43:14, 43:18, 44:1	general 21:9, 27:19 generally 35:5, 35:16 generate 17:10 generated 35:17 give 6:11, 21:21 given 43:12 glasses 18:20 go 7:8, 7:18, 8:8, 10:19, 22:4, 23:14, 29:1, 37:17, 37:20, 42:9, 42:15 goal 19:7 goes 37:6 going 7:9, 11:10, 30:19, 38:13, 38:15 good 5:9, 5:10 grams 23:20, 24:2 graphics 35:18 great 36:14 greatest 22:22, 23:1 ground 8:1 guess 9:5, 28:4	happen 11:21 happy 7:21 head 38:9 headsets 22:1 heavy 18:16 helpful 15:20, 26:13, 26:15, 37:18 here 5:14, 5:15, 6:6, 12:9, 14:21, 17:1, 17:16, 19:18, 24:5, 30:1, 32:2, 40:1 hereby 43:6 herein 5:5 hereinbefore 43:9 hereunto 44:8 highly 23:6 hoc 14:2, 17:11 hope 5:13 hoping 22:15 hot 14:2 hour 38:14 hour's 7:18 hours 10:2, 10:3 hundreds 21:22 hypothetical 19:18, 30:14,	32:21 I identification 10:13, 10:15, 14:10, 14:12, 26:18 identify 10:7, 36:6, 39:6, 39:18 illinois 2:3, 2:6, 43:5, 44:16 illumination 35:6, 35:11, 35:14 implement 18:7 implies 35:16 inc 1:5, 1:8, 6:7, 8:14, 43:15 inches 23:19, 24:1 include 25:16, 25:22, 26:7, 26:22, 27:3 includes 31:5 including 14:4, 29:8 inclusion 33:1, 33:9, 33:20 incorporating 15:9, 15:14, 16:4, 16:11 indeed 28:2 indicated 11:13 individuals 11:20, 11:22 infantry 22:2 infeasibility 20:13
G gaming 34:19	H hand 44:9 handling 34:4		

infeasible 20:11	itself 31:18, 33:5, 33:13, 33:22	last 12:7, 12:12, 13:18, 35:21, 39:1	line 11:12, 13:18, 14:19, 15:1, 26:21, 34:9, 34:13, 34:14
informed 8:2	J	later-filed 9:8	lines 15:3, 15:8, 15:13, 16:3, 16:18, 17:4, 36:15, 37:1, 37:9, 37:21
inoperable 18:5, 18:11, 18:12, 18:21, 19:13, 19:22	jacob 3:3, 37:13, 41:21	latest 22:21, 23:1	link 11:2
input 35:19	james 1:15, 2:1, 4:2, 4:11, 5:4, 43:8, 43:19	lawrence 3:13	listed 11:20
inserted 25:4	jannard 18:8, 40:2	laws 18:22, 19:15, 19:18	llp 3:4, 3:12
instruct 8:21	job 1:19	learn 40:13	located 36:19
instructing 41:18	june 1:16, 43:20, 44:10	learned 40:18	longer 10:5, 11:6, 38:16
instruction 41:16	K	least 29:21, 31:15, 37:9, 37:21	look 10:9, 37:6
intended 15:18	keep 11:10, 38:15	led 40:14	looking 13:14, 23:14, 36:1
interested 24:15, 44:5	kept 21:2	lens 34:16, 35:2, 35:10	lower 10:21
introduce 17:17	key 13:22	lens's 35:11	luxottica 1:5, 6:7
invade 42:10	kind 26:4	less 17:12	M
invention 12:19, 36:16	king 3:12	let's 6:2, 17:14, 17:16, 24:14	made 23:22
inventions 12:20, 13:10	know 7:20, 8:18, 11:21, 20:22, 21:1, 22:5, 22:21, 30:17, 40:4, 41:21	level 35:5	make 5:19, 19:7, 32:21
inventor 30:4	L	lewis 3:4	making 13:1, 20:8
inventors 12:2	language 25:21, 29:10, 29:12, 29:18, 29:22, 30:8, 30:15, 30:18, 32:20, 33:15, 34:2, 34:6	lights 37:17	many 25:19
involve 23:6, 35:1	laptop 7:7, 14:5	lightweight 18:20, 20:12	march 9:5, 12:13
involved 23:9		limit 36:21	mark 10:11, 14:9
iowa 6:17, 6:18		limitations 31:17, 33:5, 33:13, 33:22	marked 7:3, 8:6,
ipr 1:11, 5:15, 5:21, 8:15, 9:3		limited 30:1	
irrelevant 30:14		limits 20:2, 20:13	
issue 6:1			
items 11:5			

10:14, 14:11, 26:17 marketable 20:8 marriage 44:3 materials 7:1 matter 44:6 maximum 36:21 maybe 14:20 mean 12:3, 18:10, 18:12, 18:13, 18:21, 19:14, 20:1, 22:12, 24:22, 25:11, 39:15 meaning 22:16 meaningful 24:20, 25:1 meet 9:20 microsoft 21:22 might 6:2 military 21:12, 21:16, 22:6, 23:6, 23:9 millions 21:22 mind 10:6, 11:6, 11:7, 14:7 minimal 23:18, 23:19, 24:1, 24:2, 24:6, 24:8, 24:9 minutes 38:18, 38:19 module 25:10, 25:16, 25:22, 26:7,	26:12, 26:22, 27:3, 27:11, 27:16, 27:20, 28:2, 29:8, 30:6, 31:4, 31:5, 31:9, 31:21, 33:17, 38:8 modules 25:4, 38:7 moment 15:6, 26:16, 32:6, 37:17 months 40:16 more 13:2, 13:17, 19:11, 21:9, 22:14, 25:17, 25:18, 26:1, 26:2, 26:8, 26:9, 26:22, 27:4, 27:5, 27:19, 36:20 morgan 3:4 morning 5:9, 5:10, 5:14 motivated 19:10, 40:9 much 9:22, 17:12 must 31:21 myself 5:19	18:15, 18:18, 19:6, 21:3 networks 14:1, 14:2, 14:3 news 22:5 next 12:5, 13:16, 17:1, 23:13, 24:14, 35:21 nods 38:9 none 37:15 normally 29:15, 30:12 notarial 44:9 notary 2:5, 43:1, 43:4, 44:15 note 13:21 nothing 11:7, 13:15, 42:14 notice 2:2 number 4:8, 6:2, 38:6, 38:10, 40:7 numbers 42:9	29:6, 31:19, 32:7, 33:6, 34:1, 35:12, 41:12 objection 36:9, 37:4, 39:9, 41:15 objections 37:13, 38:3, 39:22 obvious 22:19, 23:4, 40:3 occluded 35:17 occurred 43:19 off-the-shelf 20:3, 20:14 offer 24:19, 24:22 office 1:1, 6:18 oh 10:21, 26:19, 37:20 okay 6:4, 6:5, 7:11, 7:22, 8:10, 9:7, 9:11, 10:9, 11:10, 15:6, 15:7, 15:21, 17:2, 18:2, 18:3, 26:21, 34:12, 36:14, 36:15, 38:4 oliver 1:15, 2:1, 4:2, 4:11, 5:4, 5:9, 12:3, 12:10, 14:14, 15:2, 21:11, 38:15, 43:8, 43:19 one 13:2, 15:6, 15:18, 25:16, 25:17, 25:22, 26:1, 26:7,
	N	O	
	natural 35:17, 35:19 necessary 18:14, 18:17 need 26:10, 34:11 neilsen 40:2, 40:5, 40:9 network 17:5, 17:11,	oath 6:12 object 8:20, 12:22, 13:6, 15:11, 15:16, 17:6, 19:2, 20:5, 20:16, 22:18, 23:21, 24:10, 25:12, 26:3, 27:12, 28:3, 28:13, 28:21,	

26:8, 26:16, 26:22, 27:3, 27:4, 28:9, 36:20, 38:7 only 31:20, 36:20, 42:8 open 7:5 operable 18:10 operating 16:15 opine 30:17 opined 37:16 opinion 20:20, 21:19, 21:20, 22:7, 28:18, 31:13, 33:1, 38:4 optics 1:8, 8:14, 43:15 order 19:7 ordinary 17:18, 18:1 original 9:13, 40:17, 40:22, 41:5, 41:10 other 7:5, 7:17, 11:5, 11:15, 13:8, 37:7, 40:10 otherwise 7:10, 44:5 out 40:1 outcome 44:6 outside 37:5, 39:10 over 21:18	overall 16:8 owner 1:9, 3:10, 8:13 P page 4:2, 4:7, 11:8, 11:9, 11:11, 12:7, 12:9, 12:12, 13:18, 14:22, 23:12, 23:13, 23:15, 35:21, 39:1, 39:2, 39:13, 39:15 pages 1:20, 14:20, 14:21 pair 20:11 paragraph 10:19, 11:8, 11:10, 11:11, 11:12, 12:16, 12:18, 13:16, 13:20, 15:5, 16:14, 16:18, 17:15, 18:3, 19:14, 20:1, 21:6, 21:8, 23:11, 23:17, 24:14, 24:16, 24:18, 25:7, 25:8, 28:7, 32:1, 32:2 part 27:8, 29:21, 31:16, 32:20, 41:22 particular 5:20, 13:14, 13:15, 17:15, 34:9 parties 44:2, 44:4 party 43:14	password 33:16 patent 1:1, 1:3, 1:9, 1:12, 3:10, 4:8, 6:1, 6:2, 6:3, 8:13, 11:19, 12:19, 12:21, 13:9, 13:10, 14:8, 14:17, 15:4, 15:8, 15:13, 16:3, 16:8, 16:19, 17:4, 19:20, 25:3, 25:20, 26:10, 26:13, 27:6, 28:9, 28:18, 29:3, 29:15, 32:4, 32:9, 35:22, 36:2, 36:7, 38:5, 38:12, 39:3, 39:7, 39:19, 39:21, 40:5 path 20:18, 20:20 penalty 6:12 people 40:6 perfect 23:14, 39:2 perform 25:17, 26:1, 26:8, 27:1, 27:4, 27:7 performance 21:17 perjury 6:13 permitted 32:14 person 17:18, 18:1 personal 10:2, 13:22, 14:1, 17:5,	17:10, 18:15, 18:18, 19:5 pertaining 24:20, 25:1 peterson 3:3, 4:3, 5:8, 10:11, 14:9, 26:17, 38:13, 38:18, 38:21, 41:17, 42:2, 42:12 petitioner 1:6, 3:2, 6:6 phrase 22:9, 22:11, 22:15, 22:17 physics 18:22, 19:15, 19:18 piece 8:1 pietrzyk 1:22, 2:2, 43:3 place 31:17, 33:4, 33:12, 33:21 plain 7:3 planet 3:19 please 7:20, 12:6, 12:7, 12:16, 13:16, 13:17, 14:9, 14:19, 15:2, 17:15, 21:6, 23:11, 23:13, 24:14, 25:7, 26:13, 27:13, 28:5, 32:1, 32:8, 34:8, 35:21, 36:6, 36:14, 38:22, 39:6, 41:17 pleasing 19:8, 20:8 point 6:17, 8:12,
---	--	--	--

13:13, 37:8, 39:11 pointing 40:1 popular 22:20 portion 27:6 posita 17:16, 17:17, 17:18, 17:22, 18:4, 18:13, 19:4, 19:21, 20:6, 20:17, 38:5, 40:8 possible 41:4, 41:7, 42:4 power 16:15, 18:7, 18:19, 20:2, 20:14 powering 16:16 preparation 9:15 prepare 9:16, 9:20, 40:14 prepared 8:19, 9:2 preparing 10:1 presence 28:19, 29:4, 29:20, 30:22, 31:7, 31:15, 32:19 present 3:18, 29:14, 30:13 press 22:20 pretty 22:13, 23:4 prevent 7:13, 28:18, 29:3, 30:11,	32:18 prevented 18:22, 19:15, 20:4 prior 9:18, 20:3, 20:15 prioritize 21:17 priority 24:4, 24:13 probably 8:8 proceeding 8:5 proceedings 7:18 procurement 22:7 produce 19:5 product 20:8, 21:12, 21:14, 21:16, 23:6, 41:20, 42:10 products 23:9 professional 2:4 project 21:12, 22:3 projects 21:17, 23:6 provide 22:16 public 2:5, 43:1, 43:5, 44:15 purpose 30:7, 33:16 pursuant 2:1 pursue 20:19, 20:21 Q question 7:9, 15:17,	15:19, 16:1, 16:22, 17:1, 19:11, 21:9, 22:8, 26:4, 26:14, 27:2, 27:8, 27:19, 30:18, 33:19, 34:7, 37:19, 40:11, 42:1 questions 7:8, 15:5, 42:13 quickly 7:4 quite 28:22, 34:7 R radio 36:21 rationale 40:3 read 15:2, 32:6, 37:1 reading 30:4, 31:2, 38:5 reads 29:7 reality 22:1, 34:19, 35:16, 35:18 really 22:7, 42:9 realtime 2:5 reason 41:18 receiver 17:12 recharging 16:15 recite 25:9, 32:3 recites 34:16, 36:2, 39:3	recognize 6:16, 14:14, 18:13, 19:6, 19:21, 20:9, 29:19, 31:14, 38:5 recognized 20:17 recognizing 30:21, 31:7 record 42:15, 42:16, 43:12 refer 5:20, 7:4, 17:22, 26:10 reference 10:20, 37:9, 37:21 referenced 9:19, 11:3 references 36:11, 40:10 referred 9:7, 9:11 referring 19:3, 25:14, 27:18 refers 15:21, 16:14 regarding 23:22 regardless 28:19, 29:4, 32:18 registered 2:4 regulation 25:4 relate 31:2 related 16:9, 44:1 relates 31:8, 31:10 relationship 34:3 relative 11:3
--	---	--	--

relevance 35:13, 36:10, 37:5, 39:10, 42:1 relevant 37:14 relied 18:6 remember 9:4, 40:16, 40:20, 41:2 remote 3:19, 10:17, 36:18 removable 27:9, 27:14, 27:17, 27:22 removably 13:4 render 35:6 repeat 15:19, 16:1, 26:4, 26:14, 27:13, 29:1, 33:7, 33:19 repeated 37:18 rephrase 18:11, 28:16 reported 1:21 reporter 2:3, 2:4, 2:5, 41:14, 43:1, 43:4 represented 42:7, 43:15 representing 6:6 required 19:5 requirements 18:7, 18:19 requires 35:5 resubmitted 9:6	result 18:6 resulting 23:18 return 21:8 revealing 8:22 review 10:3, 11:16 reviewed 9:17, 9:18 reviewing 12:14 right 5:20, 10:21, 12:5, 15:1, 42:12 road 42:10 room 6:20, 7:2 rosenblatt 13:21, 18:6 rpr 1:22, 43:4 rule 8:1	39:10 screen 28:6 scroll 13:17, 23:13 seal 44:9 seat 36:21 seattle 3:7 second 3:6, 11:12, 15:18 see 6:2, 10:18, 11:11, 14:21, 23:14, 34:20 selection 21:18 sense 32:22 sentence 12:17, 12:18, 19:3, 23:15, 23:17, 24:5, 24:15, 34:9, 34:16 separate 32:15 serving 30:7 set 43:9, 44:8 sheets 40:7 short 38:20 shorthand 2:3, 5:21, 6:3, 8:9, 17:21, 43:3 should 11:14, 12:2, 25:16, 36:4, 36:22, 38:15 sign 40:22 signature 12:9, 12:10	signature-plkal 44:13 signed 41:3, 41:4, 41:8, 42:6 since 32:16 size 18:7, 18:19, 20:2, 20:14, 39:5, 39:8, 39:20 skill 17:18, 18:1 small 17:9 smaller 17:12 smart 1:8, 8:13, 43:15 smartphones 14:6 soldiers 22:2 some 7:4, 22:16, 35:5 sophisticated 17:13 sorry 12:2, 18:11, 28:15, 37:20, 39:15 sound 41:4 spalding 3:12 spans 34:10 speaking 10:3 specialized 23:7 specific 19:11, 22:14, 40:13, 40:18, 40:20
---	---	--	---

specifically 30:3, 30:20 specified 32:16 speed 36:22 spent 10:1 spots 14:2 staking 30:16 stand 10:17 state 2:6, 21:4, 43:5, 44:16 state-of-the-art 22:2, 22:9, 22:11, 22:17, 24:3, 24:7 statement 14:7, 23:22 states 1:1, 2:3 station 27:10, 27:15, 28:1 stenographically 1:21 steps 34:11 stop 11:10 strange 33:19, 34:7 street 3:13 structural 31:17, 33:4, 33:12, 33:21 style 40:6 subject 6:12, 20:7 submitted 8:5, 8:14, 8:17, 11:2	suite 3:5, 3:14 summarize 13:12 suppose 23:3 sure 10:10 sworn 5:2, 5:6, 43:9 T table 11:3 tablets 14:5 tabs 7:4 take 7:19, 7:20, 10:9, 20:18, 34:11, 36:11, 38:14 taken 43:11 talking 19:18, 19:19, 22:22, 30:5 teachings 18:5 team 41:9 tech 3:19 technician 10:17 technologies 19:19, 21:5, 24:12 technology 19:5, 20:10, 20:21, 21:3, 21:15, 22:3, 22:10, 22:12, 22:17, 22:21, 23:1, 24:3, 24:8 tell 7:10	temperature 36:21 temples 25:5 ten 38:18 term 18:10, 18:12, 18:21, 19:13, 19:22, 23:4, 25:10 terms 7:17, 9:15 testified 5:6 testifying 6:10, 6:13, 7:14 testimony 5:15, 6:11, 8:3, 43:12 texas 2:3 text 23:12 th 44:9, 44:12 thank 5:11, 5:14, 7:22, 8:11, 26:19, 36:14, 39:2 therefore 20:18 therein 9:19 thermal 25:3 things 5:19, 30:16 think 26:10, 38:13 thinking 7:14 three 40:16 through 7:8, 26:21,	36:15, 37:10, 37:22 tiffany 1:22, 2:2, 43:3 time 5:11, 7:19, 9:22, 12:18, 19:20, 24:3, 24:4, 24:12, 42:11 today 5:12, 6:6, 6:11, 7:2, 7:8, 7:15, 9:16, 17:22 top 11:11, 23:12 toward 25:3 trademark 1:1 transceivers 14:3, 21:3 transcript 4:6, 10:16, 14:13 transmit 33:16 trial 1:3 tried 19:4 true 43:12 truthfully 7:14 try 7:18, 19:9, 19:10 trying 20:6, 42:2 tuesday 1:16, 43:20 turn 12:5, 12:7, 12:16, 13:16, 14:8, 14:19, 17:14, 21:6,
--	--	---	---

23:11, 24:14, 25:7, 32:1, 34:8, 35:21, 38:22 turning 34:22, 35:9 two 8:14, 9:1, 10:2, 10:3, 30:16 type 13:22 typically 21:17, 35:1 typo 11:8 typos 10:8, 11:16 U uh-huh 8:7, 13:19, 16:2, 16:20, 24:17, 28:8, 30:10, 31:1, 33:3, 33:11, 34:15, 39:14, 39:17 unclear 35:14 under 6:12 understand 6:8, 6:11, 6:15, 7:9, 30:21, 42:2 understanding 5:17, 8:13, 23:5, 41:9 unfruitful 20:18 united 1:1 unless 7:10 use 6:3, 8:8, 17:22, 19:22,	22:20, 24:7, 38:17 user 13:3, 25:4, 34:5, 35:7, 38:8 V various 26:11, 38:7 version 8:16, 8:18, 9:8, 9:12, 9:18 versions 8:14, 9:2 via 25:4, 43:19 vibration 38:8 videoconference 43:20 viewed 18:4 virtual 1:15, 2:1, 34:18, 34:22, 35:9, 35:15, 35:16 virtually 6:10, 43:19 visible 35:6 visual 35:2, 35:4, 35:6, 35:17, 35:19 volume 23:19, 24:1, 24:6, 24:9 vs 1:7 W want 42:9 washington 3:7 waste 42:11	way 17:7, 23:3, 32:13, 36:19, 44:5 ways 38:6, 38:10, 40:7 we'll 7:18, 34:11 we're 14:17, 19:17, 19:19, 22:22, 30:5 we've 38:13, 41:21 wearer 29:20, 30:22, 31:8, 31:15, 36:4, 36:7, 36:16, 36:22, 37:2, 37:11, 38:1 weight 18:7, 18:19, 20:2, 20:14, 23:19, 24:2, 24:6, 24:9 what-if 30:17 whatever 22:22 wherein 36:2, 39:3 whereof 44:8 whereupon 5:3 whether 35:15 wifi 14:2, 14:4, 15:9 willing 36:12 windows 7:5 wire 29:18	wireless 14:3, 29:8, 29:11, 29:21, 31:5, 31:10, 31:16, 31:21 wireless-enabled 28:10, 28:11, 28:20, 29:5, 29:9, 29:13, 29:17, 29:19, 30:13, 31:6, 31:14, 36:2, 36:18, 39:4 wirelessly 30:2, 30:7, 31:11, 36:17 within 18:18, 35:2, 36:19, 43:5 without 29:10, 29:17, 30:2 witness 5:2, 5:5, 38:17, 38:19, 43:8, 43:12, 44:8 woken 36:8, 37:2, 37:11, 38:1 work 41:20, 42:10 worked 21:11 works 22:7 worrying 40:6 wouldn't 17:7, 18:16, 32:12 wrong 11:2 Y yeah 14:22, 16:14, 22:19, 26:16,
--	--	--	---

Transcript of James Oliver, Ph.D.
Conducted on June 17, 2025

58

27:13, 27:19, 32:8, 34:2, 37:20, 40:1 year 20:21 yourself 15:4 z zoom 43:19 . .2300 3:16 .6477 3:8 0 004371 43:4 01072 1:11, 5:16 084 43:4 1 10 1:17, 4:10, 43:21 10,598,960 1:12, 4:9, 6:2 100 23:20, 24:2 1001 4:8, 11:19, 14:10, 14:11, 26:17, 34:8, 39:1 11 25:9, 28:9, 28:17, 29:2, 29:14, 30:9, 31:9, 42:16, 43:21 1301 3:6 14 4:8	1401 3:13 17 1:16, 43:20 18 44:9 19 26:21, 36:1, 36:15, 37:9, 37:21 1900 3:14 2 20 44:12 2012 20:3, 20:15 2014 4:10, 8:6, 10:12, 10:14 2017 11:14 2022 10:20, 11:1, 11:4 2024 1:11, 5:16 2025 1:16, 12:13, 20:21, 43:20, 44:10 2028 44:12 206.274 3:8 21 14:22 22 26:21, 32:3, 32:4, 32:9, 32:14, 32:17, 33:2, 33:10, 33:21 23 12:16, 12:18 25 38:22, 39:3,	39:16 28 13:18, 44:12 2800 3:5 3 31 12:13 33 23:16 34 23:12 38 1:17, 43:21 4 40 11:9, 11:11 43 25:8, 28:7 44 1:20, 36:15, 37:10, 37:22 45 32:1, 32:2, 39:13 47 17:15, 18:3, 19:14, 20:1, 21:9, 42:16, 43:21 49 13:16, 13:20 5 50 36:15, 37:10, 37:22, 39:15 52 21:6 54 14:19, 15:1, 15:3, 15:8, 15:13, 16:3, 16:18, 17:4 55 23:11, 23:17	56 10:19 587938 1:19 6 60 11:8 61 11:8 62 24:14, 24:16, 24:18 63 25:7 64 15:3, 15:8, 15:13, 16:3, 16:18, 17:4 67 34:9, 34:13 7 720.535 3:16 740 18:8 8 80202 3:15 9 90 40:6 960 6:3, 11:19, 12:19, 12:21, 13:9, 14:8, 14:18, 15:3, 15:8, 15:13, 16:3, 16:19, 17:4, 24:4, 24:12, 28:9, 28:17, 29:2, 29:14, 32:4, 32:9, 35:22, 36:1, 36:6,
--	--	---	--