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

ADOBE, INC.,	§	
	§	
Petitioner,	§	Inter Partes Review No.
	§	IPR2024-01352
VS.	§	
	§	
	§	
JONATHAN E. JAFFE,	§	U.S. Patent No. 6,757,828
	§	
Patent Owner.	§	
	§	

ORAL & VIDEOTAPED DEPOSITION OF
ZIXIANG XIONG, PHD
MAY 16, 2025
(VIA ZOOM VIDEOCONFERENCE)

ORAL & VIDEOTAPED DEPOSITION OF ZIXIANG XIONG, PhD, produced as a witness at the instance of the Patent owner and duly sworn, was taken in the above-styled and numbered cause on Friday, May 16, 2025, from 10:41 a.m. to 5:39 p.m., before Kari Behan, CCR, CSR, a Texas certified machine shorthand reporter, with the witness participating remotely.

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JAFFE EX. 2012, Page 1 of 207
Adobe v. Jaffe, IPR2024-01352

A P P E A R A N C E S

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THE VIDEOGRAPHER:

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- - -

I N D E X

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WITNESS: ZIXIANG XIONG	PAGE
BY MR. ATKINSON	5
CHANGES AND SIGNATURE	127
REPORTER'S CERTIFICATION	127

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E X H I B I T S

EXHIBITS	DESCRIPTION	PAGE
Exhibit 1001	Declaration of Zixiang Xiong, PhD	35
Exhibit 1002	Patent No.: US 6,757,828 B1	18
Exhibit 1003	Prosecution History for the '828 Patent	9
Exhibit 1005	US Patent No.: 6,332,103 (Glass)	67
Exhibit 1006	Document titled "Digital Image Recording for Court-Related Purposes," Bernd Rieger	120
Exhibit 1008	Exif 2-0	127
Exhibit 1009	Exif 2-1	127
Exhibit 1011	US Patent No.: 6,959,384 (Serret-Avila)	127

(REPORTER'S NOTE: All quotations from exhibits are reflected in the manner in which they were read into the record and do not necessarily denote an exact quote from the document.)

PROCEEDINGS:

(Friday, May 16, 2025, at 10:41 a.m.)

THE VIDEOGRAPHER: We're on the record. Today's date is Friday, May 16th, 2025. The time is 10:41. This is the deposition of Dr. Zixiang Xiong relative to a case styled "Adobe, Inc. versus Jonathan E. Jaffe." This case is filed in the United States Patent and Trademark Office Before the Patent Trial and Appeal Board.

Counsel, at this time, would you state your appearances for the record, beginning with the taking counsel, and the reporter can then place our witness under oath.

MR. ATKINSON: This is Bryan Atkinson of the Law firm Dickinson Wright for Patent Owner Jonathan Jaffe.

MR. LIAW: -- Liaw of Farella Braun & Martel on behalf of Petitioner and the witness, and I'm joined by my -- by my client representative.

THE COURT REPORTER: I don't -- I didn't even get your name.

MR. ATKINSON: Yeah, you've got your hand over your mouth, sir.

MR. LIAW: I'll -- I'll repeat that. Winston Liaw of Farella Braun & Martel on behalf of

Petitioner and the witness, and we are joined today by our client representative, Tom Carmack.

ZIXIANG XIONG, PhD,

after having been first duly sworn by the above-mentioned Certified Court Reporter, was examined and testified as follows:

EXAMINATION

BY MR. ATKINSON:

Q. Dr. Xiong, would you -- can you state your full name for the record, please?

A. Sure. Good morning, Mr. Atkinson. My name is Zixiang Xiong, X-I-O-N-G.

Q. And you're appearing today remotely via Zoom; is that correct?

A. Remotely between us, but I'm at the law firm of Farella in San Francisco with counsel, Winston Liaw.

THE COURT REPORTER: I'm sorry. I didn't understand the beginning of your answer.

THE WITNESS: Counsel, would you mind asking your question again that way we can just repeat the whole thing for Kari.

BY MR. ATKINSON:

Q. So you're appearing today remotely by Zoom; is that correct?

A. Somewhat. I mean, I'm remotely here in

San Francisco with you, but I'm together with my counsel Winston Liaw at law firm.

Q. And you're at the law firm of -- you're at Mr. Liaw's law firm; is that correct?

A. That's correct.

Q. One of the offices of the law firm?

A. Yes, in San Francisco.

Q. Okay. And besides Mr. Liaw, is there anyone else in the room with you today?

A. Mr. Tom Carmack. I think he is our client; he's also in the room.

Q. Okay. I see Mr. Carmack is also -- there's a -- there's a Zoom reference to him. Is Mr. Carmack both in the room and on -- on a separate device?

A. That's correct.

Q. Okay. Besides Mr. Liaw and Mr. Carmack, is anyone else in the room?

A. No.

Q. Okay. And during the pendency of the -- of this -- of this deposition, do you intend to have any communications regarding the subject matter of the deposition with Mr. Carmack or Mr. Liaw?

A. Can you repeat the question, Mr. Atkinson?

Q. During -- during the pendency of this deposition today, are you intending to have any

JAFFE EX. 2012, Page 6 of 207
Adobe v. Jaffe, IPR2024-01352

communications with Mr. Liaw or Mr. Carmack regarding the subject of the deposition?

A. No. No, I don't think so.

Q. Okay. During breaks if you speak about the deposition with Mr. Liaw or Mr. Carmack, will you please let me know when we go back on the record?

A. I don't plan to, Mr. Atkinson.

Q. Okay. And if anyone else joins you in the room, would you -- and we don't notice it, would you please let -- let us know that they've arrived and who -- who has joined you in the room?

A. Sure. Sure. I'll do that.

Q. Okay. Have you been deposed before?

A. You mean for other cases?

Q. I'm sorry. I didn't -- I didn't hear that.

A. You mean have I deposed before for other cases, not for this one, right?

Q. Yes. Yes, in any other cases.

A. Yes. Yes, I have.

Q. Do you know about how many times you've been deposed?

A. This is my tenth deposition.

Q. Okay. And at the beginning, we took an oath, so you understand that you're under oath today; is that correct?

JAFFE EX. 2012, Page 7 of 207
Adobe v. Jaffe, IPR2024-01352

A. Correct.

Q. Okay. And you understand that the court reporter will need verbal answers to questions rather than nodding your head or gesturing?

A. I do.

Q. Okay. And if you don't understand any of my questions today, you understand that you can ask me to clarify the question; is that correct?

A. Yes. I've been doing that, as you've noticed.

Q. Okay. And if you need a break, would you please just ask me, and we can take a break? But I ask you to first answer any questions that are pending before we -- we -- before we take the break.

Can we agree to that?

A. Sure. Sure, we can.

Q. Okay. Are you aware of any reason that you can't provide truthful and complete testimony here today?

A. No.

Q. Okay. And can we agree that you won't communicate secretly with anyone for the duration of this deposition?

A. Sure, we can.

Q. Okay. Do you have any papers with you that you brought with you to the deposition here today?

JAFFE EX. 2012, Page 8 of 207
Adobe v. Jaffe, IPR2024-01352

A. Nothing.

Q. Okay. And you understand that this deposition relates to US Patent No. 6,757,828?

A. I do.

Q. You're familiar with that patent?

A. Yes.

Q. And so if I refer to the '8- -- to that patent as the '828 Patent, would that be okay?

A. Sure.

Q. And before we get started, do you have access to the Exhibit Share functionality from Veritext?

A. Hang on one sec. Just the -- there's a folder called "My Files and Content." Is this the one you're referring to, Mr. Atkinson, or --

Q. I don't know. So there's like a -- on my screen, there's a -- there's a box that has Exhibit Share. Here, let me -- let me -- here, I'll try sharing an exhibit with you. Let's see if -- if it shows up. I'm going to share with you Exhibit 1003, your declaration that you've prepared in this -- for this proceeding.

A. Okay.

(Exhibit 1003 was marked for identification.)

BY MR. ATKINSON:

Q. Let me know if it shows up on your end.

MR. LIAW: Should be the "My Veritext" tab, one of them on the right -- [inaudible].

MR. ATKINSON: We can go off the record briefly if you need to -- we need to set this up.

THE VIDEOGRAPHER: Everybody stand by.

We are going to go off the record at 10:50.

(Brief recess taken.)

THE VIDEOGRAPHER: Okay. We're back on the record at 11:03.

BY MR. ATKINSON:

Q. Dr. Xiong, would you mind, please, turning in your -- in your declaration to page 43, paragraph 93? Let me know when you're there.

A. Yes, I am.

Q. In the second sentence, you say -- you say, "The term 'tightly coupled' is not a term of art in the context of Claim 1."

You see that?

A. Yes, I do.

Q. Would a person of ordinary skill in the art have an understanding as to what the -- the term "tightly coupled" would mean generally?

A. If you look at paragraph 94 of my report, the first sentence says, actually, "The patent applicants

described what they meant by the term 'tight coupling' during prosecution."

Q. So let me -- let me clarify my question.

So outside of the -- of the patent, if -- if a person of ordinary skill in -- in the art heard the word -- the words "tightly coupled," would a person of ordinary skill in the art understand what those words mean?

A. It would mean the plain and ordinary meaning.

Q. Yeah. Yeah.

Would the -- would a person of ordinary skill in the art have a plain and ordinary meaning that they'd ascribe to the term "tightly coupled"?

THE WITNESS: May I interrupt? One of -- someone just came in.

MR. ATKINSON: Oh, yeah. Who just came in?

MR. LIAW: Mr. Jim Day came in to drop off paper copies of the exhibits.

MR. ATKINSON: Okay.

BY MR. ATKINSON:

Q. So the -- the pending question is -- is whether a person of ordinary skill in the art would understand, outside the context of the patent, what -- what the words "tightly coupled" mean?

MR. LIAW: Objection, scope. It's beyond

JAFFE EX. 2012, Page 11 of 207
Adobe v. Jaffe, IPR2024-01352

the scope of the declaration.

THE WITNESS: I'm going to stay with what I -- I said in paragraph 96 of my declaration. It says, "Thus, for purposes of my analysis of the challenged claims, I understand that 'a sensor, which is tightly coupled to said memory' means 'a sensor coupled to said memory via conductive traces or leads.'"

Q. And so what does the word "coupled" mean?

A. Under what context, Mr. Atkinson?

Q. If two things are coupled, what does -- what does it mean for -- for two things to be coupled together?

A. Again, what -- under what context are you meaning?

Q. Well, so in -- well, in the context of -- of -- in this example we have here, we have a sensor and -- and a -- and memory, which is -- and they're -- and those two things are tightly coupled, according to the claim language; is that right?

A. So, again, can you -- I mean, I don't under- --

Q. Well, the -- the claim language recites "a sensor which is tightly coupled to said memory." So the claim requires a sensor and memory that the sensor and the memory be tightly coupled.

Is -- do I have that right, or is that

incorrect?

A. Again, in paragraph 93, Claim 1 says, "a sensor, which is tightly coupled to said memory." That's what the claim language says.

Q. Right.

So what does it mean for a sensor to be coupled to memory?

A. As I just mentioned, that -- that was already stated in paragraph 96 of my -- my report. It means a sensor coupled to said memory via conductive traces or leads.

Q. Right.

So it -- it repeats the word "coupled." What does the word "coupled" mean?

A. Again, do you mean within this context of Claim 1?

Q. Sure.

A. It means connected.

Q. Okay. And so if something generally is tightly coupled or tightly connected, outside the -- in general, what would that mean to a person of ordinary skill in the art?

A. Again, can you repeat the question, because I want to make sure you mean the --

Q. Even -- even outside of the context of the

patent, if a person of ordinary skill in the art heard that a sensor was tightly coupled to memory, what would a person of ordinary skill in the art understand "tightly coupled" to mean?

A. Yeah. Mr. Atkinson --

Q. In general -- in general.

A. Right. I already mentioned that outside the scope of -- of this Claim 1, but then you said the sensor and the said memory. That -- that was terms in Claim 1.

So I'm a bit confused. We already talked about --

Q. Well -- so sensors -- sensors exist generally in the world outside the -- outside of the '828 or -- yeah -- '828 Patent; is that correct?

A. In general, I would say yes.

Q. Okay. And memory is a thing that exists in the world outside of the '828 patent; is that correct?

A. Again, you -- what memory you're talking about? Any memory? I mean --

Q. Any memory.

A. Okay. Then can you repeat the question?

Q. So memory is a thing that exists outside of the '828 patent -- is that correct -- in computer technology?

JAFFE EX. 2012, Page 14 of 207
Adobe v. Jaffe, IPR2024-01352

A. So, again, memory can be --

Q. In computer technology, is -- is memory a -- a thing that -- a physical thing that a person of ordinary skill in the art would generally understand?

A. In general, I agree, yes.

Q. Okay. Do you -- do you know of any examples of -- of memory that exist in computer -- in computer technology?

A. I think so, yes.

Q. Can you list some?

A. I mean, one example will be my flash memory, my thumb drive. I mean, there are many, many other examples.

Q. Okay. And if memory was coupled to a sensor in a general device, not necessarily one covered by the '828 patent, what would that mean?

A. I'm sorry. In the middle part, I didn't get it. Can you repeat the question, please?

Q. I'm sorry.

If a sensor was coupled to memory generally, not necessarily within the context of the '828 patent, what would that mean to a person of ordinary skill in the art?

MR. LIAW: Object to the scope.

THE WITNESS: That's outside the scope of

JAFFE EX. 2012, Page 15 of 207
Adobe v. Jaffe, IPR2024-01352

my report, so I -- I don't know.

BY MR. ATKINSON:

Q. So you don't think a person of ordinary skill in the art would understand what a -- what the -- what the words "a sensor is coupled to memory" means?

A. Again, my report was limited to Claim 1, at least in this part, in terms of the tight coupling between the sensor and said memory within the context of Claim 1 of '828 patent.

I -- I didn't perform any analysis outside the scope of -- of this patent or Claim 1. So I -- I don't have an opinion on what it means to -- to, you know -- to say the sensor is coupled.

Q. Have you encountered the word "coupled" in your work?

A. My work?

Q. Generally. Not necessarily with respect to the '828 patent, but generally.

A. You mean my -- my work? What do you mean by my work? Can you be more specific?

Q. Your academic work and research.

A. In general, yes.

Q. And what does -- in general research articles, what would the word "coupled" mean?

A. Again, I'm just putting that in a very general

JAFFE EX. 2012, Page 16 of 207
Adobe v. Jaffe, IPR2024-01352

statement. In my view, "coupled" generally means connected, as I stated earlier.

Q. Okay. And if you encountered the words "tightly coupled" in gen- -- in a general -- in a general research article, what would that mean to you?

A. Again, I -- I haven't really thought deep into that, so I -- right now, on the top of my head, I don't have an answer for you, Mr. Atkinson.

Q. Do you have any understanding of what the word "tightly" means in relation to connections in general research?

A. Again, this is outside the scope of my report, so -- so I -- I haven't, you know, spent time, you know, studying or researching it, so I -- I -- I don't have an opinion sitting here today.

Q. Do you know what the word "tightly" means, generally?

A. Again, I mean, I can just -- just go to the dictionary, yeah, I mean, tight in general. I mean, I -- yeah, "tight" means -- it means -- yeah, it means tight.

Q. Okay. So if one wanted to find a general definition of the words "tightly coupled," would a person of ordinary skill in the art consult dictionary definitions?

JAFFE EX. 2012, Page 17 of 207
Adobe v. Jaffe, IPR2024-01352

A. I wouldn't -- as I mentioned earlier, I was referring to tight, right, and I don't know whether, you know, a dictionary has meaning of it. You can look up tightly coupled. I don't know.

Q. Okay. So did you -- did you look up the words "tightly" or "coupled" when you were preparing your declaration in a dictionary -- in any technical dictionaries or otherwise?

A. Again, I don't recall, sitting here today.

(Exhibit 1002 was marked for identification.)

BY MR. ATKINSON:

Q. Okay. If you don't mind turning to -- sorry -- in the Exhibit Share, Exhibit 1002, which in the Exhibit Share is the third exhibit, the prosecution history for the '828 patent.

A. Mr. Atkinson, I have -- Mr. Day dropped off hard copy. I have a copy of it. Would you mind if I look at --

Q. Yeah. No, no.

Yeah, we -- we can use the hard copy for that -- if that's easier. It may be easier.

A. I think so. Thank you -- thank you for your flexibility.

Q. All right. Well, so, Exhibit 1002 is the

JAFFE EX. 2012, Page 18 of 207
Adobe v. Jaffe, IPR2024-01352

prosecution history of the '828 patent?

A. Yes.

Q. Yeah, that's it.

And -- hold on. Let me get you a page number.

Would you turn to page 277?

A. Yes. Thank you.

Q. I gotta get there too. Hang on.

A. I'm getting a pen from Mr. Liaw.

Q. No problem.

Let me know when you're -- are -- you're at -- are you at page 277?

A. Yes. Yes, I am.

Q. Okay. And you'll see -- you'll see in -- well, not -- I guess, after the -- after -- after it -- after the -- the quote in the first paragraph, you'll see where it says -- not -- well, there's a break, and it starts with "Exemplary structure..."

Do you see that?

A. Yes.

Q. It says, "Exemplary structure or method steps corresponding to this claim feature is shown in Figure 2A of the subject application."

You see that?

A. Yes.

JAFFE EX. 2012, Page 19 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Do you have an understanding of what the words "exemplary structure or method steps" means?

A. Not on the top of my head.

Q. Do you have an understanding of what the word "exemplary" means?

A. You mean the word "exemplary" -- "exemplary" alone?

Q. Yes.

A. To a certain extent, yes, I mean, I understand roughly what the word "exemplary" means.

Q. Okay. What -- what was -- what does the word "exemplary" mean to you?

A. Well, the one simple meaning would be like an example. For example, exemplary school means a good school.

Q. So exemplary, it means -- generally means example; is that what you said?

A. Yes.

Q. Okay. And then, starting on the fourth line, it says, "Because the processor is 'tightly coupled' to the memory, it will be virtually impossible for a user to supply false information to the memory by break-" -- "by breaking the conductive trace or lead between the memory and the processor."

You see that sentence?

JAFFE EX. 2012, Page 20 of 207
Adobe v. Jaffe, IPR2024-01352

A. Yes, I do.

Q. Okay. Now, was this the sentence that you relied upon in coming to your conclusions regarding the meaning of the -- of the term -- the term "tightly coupled" in the context of the Claim 1 of the '828 Patent?

A. Let's see. If I can refer you back to my report, my declaration --

Q. Yeah.

A. -- Exhibit 1003, we were talking about paragraph 93, right, early on, Mr. Atkinson?

Q. Yes.

A. So if we go on to paragraphs 94 and 95, and all the way to 96, I'll quickly just summarize what I stated in -- in paragraph 94.

If I start from -- this is page 43 of my declaration. Are you with me? Page 43.

Q. Let me open it. Hold on.

You said 94?

A. Yeah, paragraph 94.

Q. Okay.

A. Page 43.

Q. I'm there.

A. Okay. So maybe I'll just start with the first sentence of paragraph 94. It says, "The patent

JAFFE EX. 2012, Page 21 of 207
Adobe v. Jaffe, IPR2024-01352

applicants described what they meant by the term 'tight coupling' during prosecution."

And now I'll just skip the next sentence. I'll go on to the -- the -- the fifth line, the next sentence. Are you with me?

Q. Yes.

A. It says, "The applicants then argued that the cited prior" -- art, I guess -- "does not teach or suggest the step of 'utilizing a sensor, which is tightly coupled to said memory, to generate at least one internal and unique parameter.'"

And then I go on. I said, "The applicants stated that an example" -- and that echoes to the exemplary example we -- you and I talked about a moment ago. Let me read to you this sentence. It says, "The applicants stated that an example of this limitation is illustrated in Figure 2A showing 'a processor 157 which is ‘tightly coupled’ to a memory'" -- and then I'm going on to the next page, 44 -- "explaining that 'because the processor is ‘tightly coupled’ to the memory, it will be virtually impossible for a user to supply false information to the memory by breaking the conductive trace or lead between the memory and processor.' This reference to the 'conductive trace or lead' between two components is the only description of any means for

JAFFE EX. 2012, Page 22 of 207
Adobe v. Jaffe, IPR2024-01352

coupling components that the applicants considered to be 'tightly coupled.' A POSITA would therefore understand the term 'a sensor, which is tightly coupled to said memory' to include at least 'a sensor coupled to said memory via conductive traces or leads.'"

Q. Okay.

A. Let me -- let me finish with paragraph 95 to boast my analysis.

Paragraph 95 starts with: "In addition to the patent and the prosecution history, I reviewed the tentative claim construction order of the district court in the related litigation. In that tentative order, the judge determined that 'a sensor, which is tightly coupled to said memory' means 'a sensor coupled to said memory via conductive traces or lead.'"

So -- so I've considered both the prosecution history and the -- the judge's, in the related district case, tentative order.

So in light of the applicant's statement in the prosecution history, I agree that a POSITA would interpret this -- this term as what "tentative" means.

Q. Okay. If we didn't have the -- the tentative claim construction order from the district court, if that didn't exist, would that change your opinion as to what the words "tightly coupled" in the '828 Patent

JAFFE EX. 2012, Page 23 of 207
Adobe v. Jaffe, IPR2024-01352

mean?

A. No.

Q. Okay. What is a conductive trace or lead?

A. So this has two parts, right? It says conductive trace or lead. So I started with the first one.

Q. What will -- yeah. If we want to break it apart, that's fine.

What's conductive trace?

A. Yeah. So now we're talking about a circuit board, right, like a TCB. A conductive trace will be the little, kind of, copper wire -- well, a trace on connection. I mean, if you open a -- a PC board, you see all these, you know, thin copper -- copper lines. The -- that's what we call trace between components, and that's what we're talking about, and they are conducted.

Q. And what is a lead?

A. Lead is short for lead wires. You know, this is for components. You want a -- an example, you look at a capacitor, right? There are two, sort of, lead wires, and then you can connect one to the positive; for example, [inaudible] to the negative one. So general leads mean --

THE COURT REPORTER: I'm sorry. I'm sorry. You're hard to understand, and when you speed up, you're

JAFFE EX. 2012, Page 24 of 207
Adobe v. Jaffe, IPR2024-01352

even harder to understand.

THE WITNESS: I'm sorry.

THE COURT REPORTER: That's okay. This is -- this is just difficult.

THE WITNESS: Yeah, I'll slow down for you, Kari.

So conductive leads in general means conductive lead wires. It's a lead that would be short for lead wires.

BY MR. ATKINSON:

Q. Okay. Are you familiar with -- with ribbon cables?

A. No.

Q. What about floppy disk drives? Have -- they're a little bit -- they're a little bit antiquated now, but are you familiar with floppy disk drives?

A. Yes.

Q. In computers that had floppy disk drives, how were the floppy drives generally connected to the processor?

A. Well, in simple terms, without getting into the details, in the old computers, they have a slot for inserting floppy drives.

Q. And so how is the slot that received the floppy drive connected to the -- connected to processors -- to

JAFFE EX. 2012, Page 25 of 207
Adobe v. Jaffe, IPR2024-01352

the processor?

A. Again, I -- this is -- I don't think I -- I offered any opinion on. This is outside of the scope of my report, so I -- I have some general ideas, but without, you know, spending time on -- on the details, I -- I don't have the detailed answer for you.

Q. So are you familiar with how floppy drives are connected to processors in general-purpose computers at the time of the '828 Patent?

A. I have some general, you know, ideas but not -- not detailed, as I mentioned, answers for you sitting right here today.

Q. So that wasn't something you considered in forming your opinions in your dec- -- that you explain in your declaration?

A. Would you mind repeating your question, please?

Q. Did you consider the connections between the processor of a general-purpose computer and a floppy drive when you're -- when you were arriving at your opinions in paragraphs 93 and 94 of your declaration?

A. I can refer you to paragraph 60 on page 26 of my declaration.

Q. Okay. Let me get there. Paragraph 60?

A. Yeah. Well, actually, you can look at paragraph 20 -- I mean, page 27.

JAFFE EX. 2012, Page 26 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Okay. I'm at page 27.

A. All right. And then, of course, paragraph 60 is just -- just a -- an appendix page.

But we can focus on Figure 2A on page 27.

Q. Yes.

A. That's Figure 2A of the '828 Patent.

Q. I -- I see it.

So referring to Figure 2A, are you -- are you -- do you mean that -- are you referring to the fact that there's a -- the -- the -- there's processor, 157, and floppy drive -- 3.5-inch floppy drive (recorder), 142?

A. Yes. Floppy drive is part of the -- Figure 2A, yes.

Q. And there's a connection between the processor and the floppy drive in Figure 2A?

A. Yeah. In Figure 2A, if you look at, you know, Unit 141 -- you have 142 and then 141. You see that? Both show 3.5-inch floppy drive, and the first one, there's a parentheses under it says "recorder," and the second one, it has this again under, parenthesis, "removable recording media."

Q. So the 141, that's the disk, and the 142 is the drive; is that -- is that right?

A. Right. Yes.

Q. Okay. And there's a connection between the processor and the 3.5-inch floppy drive; is that right?

A. Right.

Q. Is the processor tightly coupled to the 3.5-inch floppy drive in Figure 2A?

A. Again, this is not part of my analysis because the -- again, going back to what we earlier talked about in the claim construction, right? Claim 1 says -- I'm going back to page 43 again -- "a sensor, which is tightly coupled to said memory."

So we're talking about the tight coupling between the sensor and -- and memory.

Q. Okay. And so, going back to Figure 2A, is the sensor in the preferred embodiment the -- the element marked with 73, the lens CCD sensor set?

A. Yes.

Q. So is -- is that element -- is that -- is that the sensor in the preferred embodiment of the '828 Patent?

A. It's one embodiment, yes. It's one embodiment.

Q. One embodi- -- okay.

In one embodiment of the '828 Patent, the sensor is the -- is this lens CCD sensor set, 73; is that right?

A. Again, yes, one -- one example or one

JAFFE EX. 2012, Page 28 of 207
Adobe v. Jaffe, IPR2024-01352

embodiment, yes.

Q. Okay. And what's the memory in the embodiment shown in Figure 2A?

A. Would be the floppy disk.

Q. Okay. And so is the -- is 73 connected to the floppy disk by a con- -- by connective leads or traces?

A. No, I mean floppy drive, 142, that they quoted.

Q. Okay. Is the sensor set, 73, connected to 142, the 3.5-inch floppy drive by connective leads or traces?

A. On the figure, I mean, if you look at the claim construction and -- the answer is yes.

Q. Okay. How were floppy drives connected to motherboards in general-purpose computers at the time of the '828 Patent?

A. Can you repeat the question?

Q. How were floppy drives connected to motherboards in general-purpose computers at the time of the '828 Patent?

A. Again, I go back to paragraph 96 of my declaration, that a sensor is coupled to said memory, which is the floppy drive via conductive traces or leads.

Q. So -- okay. So I understand that -- that -- that you're saying that -- so it's your understanding that the connection is -- so -- well, okay. Let me --

JAFFE EX. 2012, Page 29 of 207
Adobe v. Jaffe, IPR2024-01352

let me withdraw.

Were processors in general-purpose computers at the time of the '828 Patent typically located on motherboards?

A. I'm sorry. Can you repeat the question?

Q. Were processors in general-purpose computers at the time of the '828 Patent located on motherboards?

A. Are you talking about a computer motherboard or a mother- --

Q. Yes, general-purpose computer motherboard.

A. I would say generally, yes.

Q. Okay. And were floppy drives located on motherboards at the time of the '828 Patent?

A. Again, the claim requires a sensor that is tightly coupled to said memory.

Q. I understand that. That's -- that's not -- that's not my question.

My question is: In general-purpose computers at the time of the '828 Patent, were floppy drives physically located on the motherboard, or were they connected to the motherboard?

A. I'm sorry. Yeah. Can you repeat the question again?

Q. In general-purpose computers at the time of the '828 Patent, were floppy drives located on the

JAFFE EX. 2012, Page 30 of 207
Adobe v. Jaffe, IPR2024-01352

motherboard, or were they connected to the motherboard?

A. The floppy drive is usually, in systems, the device.

So when you say it's on the motherboard, so what do you mean by that?

Q. Well, is the floppy drive a separate device from the motherboard?

A. Again, in general, it could be, yes. It could be.

Q. Okay. In order for the processor to talk to the floppy drive, how was -- how was the floppy drive connected to the processor on the motherboard?

A. Again, through conductive traces or leads.

Q. Okay. And in general-purpose computers, was that typically done through cables or -- or how -- what was -- what -- what's physical coll- -- physical connection between the motherboard and the floppy drive in general-purpose computers at the time?

A. As I mentioned, they're connected via conductive traces or leads.

Q. Okay. And would a cable provide a conductive trace or lead in a general-purpose computer?

A. I didn't say that. Is --

Q. Well, that's why I'm asking.

Does the cable provide a conductive trace

JAFFE EX. 2012, Page 31 of 207
Adobe v. Jaffe, IPR2024-01352

or lead?

A. What do you mean by "cable"?

Q. Like, for example, a ribbon cable --

A. I --

Q. -- or a wadded-out ISA cable.

A. Again -- again --

THE COURT REPORTER: I didn't get the question. I'm sorry. Your hands are in front of your mouth. This Zoom is really hard.

MR. ATKINSON: I'm sorry. I'm sorry.

THE COURT REPORTER: Can you repeat your question?

BY MR. ATKINSON:

Q. Would an ISA cable in a general-purpose computer at the time of the '828 Patent provide a conductive trace or lead?

A. Again, this is not part of my analysis. I don't have -- I don't have an answer. I don't have any idea.

Q. So you don't know whether a -- whether a cable would provide a connector [sic] trace or lead?

A. I don't know.

Q. Okay. Have you seen any floppy drives that were physically located on motherboards generally, in your experience?

A. Again, you are talking about this is -- you're talking about the -- talking about the patent Year 2000?

Q. At the time of the '828 Patent, yeah.

A. I don't -- I mean, I don't recall. It was 25 years ago. I don't remember.

Q. Do you remember how floppy drives were connected to motherboards in computers 25 years ago?

A. As I mentioned earlier, Mr. Atkinson, they are connected through conductive wire -- I mean, trace or leads.

Q. Okay. So if they're connected by connective [sic] traces or leads, the connections that existed at the time of the '828 Patent would -- between motherboards and floppy drives would -- would form connective traces or leads; is that right?

A. I'm sorry.

MR. LIAW: Objection, vague.

THE WITNESS: Can you repeat the question? Yes.

BY MR. ATKINSON:

Q. Would the connec- -- the -- the typical connections between processors on the motherboard and floppy drives in general-purpose computers at the time of the '828 Patent form connective traces or leads?

A. I didn't get the last part. Form conductive

JAFFE EX. 2012, Page 33 of 207
Adobe v. Jaffe, IPR2024-01352

or -- can you repeat the last --

Q. Would the -- would the connections that were generally used between processors and 3.5-inch floppy drives at the time of the '828 Patent form connective traces or leads?

A. I don't understand the question. What do you mean by "the connection"?

I already said that they're connected by conductive traces and leads.

Q. Right.

So if the typical way of connecting a -- a processor to a -- to a 3.5-inch floppy drive was by a cable, would that cable be an example of a connective trace or lead?

A. Again, that's a hypothetical question. I -- I don't know. I don't have an answer.

Q. Okay. Do you remember how -- what type of cables were used to connect floppy drives at the time of the '828 Patent?

A. Again, I -- I -- you know, this is more than 25 years ago. I -- I don't recall. I don't remember.

Q. Okay. In the example of Figure 2A, the 3.5-inch floppy drive found at 142, that's the -- that's the memory; is that right?

A. You can say that.

JAFFE EX. 2012, Page 34 of 207
Adobe v. Jaffe, IPR2024-01352

Q. The example of the memory illustrated in Figure 2A of the '828 Patent is floppy -- is 3.5-inch floppy drive, Element 142; is that right?

A. I'm sorry. Can you repeat the question?

Q. The -- the memory illustrated in the embodiment shown in Figure 2A is 3.5-inch floppy drive, 142; is that right?

A. Just one example of the memory.

Q. Okay. You see any other examples of memory illustrated in Figure 2A?

A. I don't -- I don't have an answer on this question. I don't know.

Q. So the floppy drive is at least one example of memory, and you're -- and you don't know if there's any other memory illustrated in Fig- -- in Figure 2A?

A. Correct.

(Exhibit 1001 was marked for identification.)

BY MR. ATKINSON:

Q. Okay. Would you turn to the '828 Patent, Exhibit 1001? And turn to Figure 1 on the second page.

A. Okay. Yes, I'm looking at it.

Q. Are you generally familiar what's -- with what's illustrated in Figure 1 of the '828 Patent?

A. Again, can you elaborate? What do you mean by

that?

Q. What's illustrated in Figure 1 of the '828 Patent?

A. Again, without specifics -- I mean, just looking at the figure, I mean, there's descriptions in the spec. Is that what you mean?

Q. Well, do you have an understanding of what's illustrated in Figure 1, just generally?

A. I -- I would review what -- the, you know, relevant description of Figure 1 in the spec.

Q. Would you describe -- you know, Element 252, is that -- is that pointing to a general-purpose computer?

A. Again, I'm looking actually Element 4 of the spec, between lines 36 and 51 that describe Figure 1. So if you want me to identify --

Q. Well, so -- yeah. So let's go -- can you go to line 40?

A. Yeah.

Q. You see where it says "General Purpose Mic- -- Microcomputer 252"?

A. I see that.

Q. So is it your understanding that Element 252 of -- of Figure 1 is the general-purpose computer?

A. That's what 940 says, yes.

Q. Okay. If you'll turn back to Figure 1 --

JAFFE EX. 2012, Page 36 of 207
Adobe v. Jaffe, IPR2024-01352

A. Okay.

Q. -- do you see a floppy drive illustrated -- illustrated in -- in the depiction of general-purpose computer, 252?

A. I see that.

Q. Okay. And Element 258, is that a flop- -- is that kind of a depiction of a floppy disk?

A. It looks like it.

Q. Okay. So would the floppy drive corres- -- in -- in Figure 1 correspond to the floppy drive labeled in Figure 2A?

A. Which -- which one are you referring to that in Figure --

Q. I'm pointing to -- to Figure 1 and Figure 2A.

So we -- you testified that -- that it looks like there's a floppy drive illustrated in general computer -- in general-purpose computer, 252; is that right?

A. I just did, yes.

Q. And then if we -- we go to Figure 2A, there's a 3.5-inch floppy drive at the bottom of the figure; is that right?

A. "Bottom of the figure," are you talking about 142 or 141, particularly?

Q. 142 is the drive, I think.

A. Yes.

Q. So that -- that 1 -- that floppy drive, 142, that corresponds to the depiction of a floppy drive in -- in computer 252 of Figure 1; is that correct?

A. Yeah. I just want to, yeah, at least clarify. Right?

Q. Okay.

A. In Figure 1, Unit 252, there's a monitor. Underneath the monitor, there's just a couple of things. One of them could be a floppy drive, yes.

Q. All right. If you turn to column 3, line 16 --

A. Yes.

Q. Hold on. I gotta get back there. Hold on.

-- the first sentence says, “a key to verifiable authenticity is to insure that the authentication information generation is tightly coupled to the sensor set and recorder."

You see that?

A. Yes.

Q. So the recorder in Figure 2A, is that the -- is that the floppy drive?

A. That's what it says in Figure 2A under leads, there's a parenthesis that says "recorder."

Q. Okay.

THE COURT REPORTER: I'm sorry. I didn't

JAFFE EX. 2012, Page 38 of 207
Adobe v. Jaffe, IPR2024-01352

-- I know you read from the document, but I didn't get it.

THE WITNESS: I'm sorry.

I said, "That's what it says in Figure 2A, Unit 142, under 3.5-inch floppy drive, there's a parenthesis. Inside the parenthesis, it says "recorder."

BY MR. ATKINSON:

Q. Okay. If you'll turn to column 4, lines 65 through 67. Do you -- can you turn there, please?

A. Yes.

Q. You see where it says, "During the operation of the camera, internal security 14 is monitored to detect the integrity of the tight coupling of the sensor set and the recorder 6"?

A. Yes, I see that. Yes.

Q. What -- what does it mean to monitor -- to monitor to detect the integrity of the tight coupling of the sensor set and the recorder?

A. If I can point to -- you to page 45 of my declaration.

Q. Okay.

A. Are you there?

Q. Yes.

A. So let me first echo what your question's

JAFFE EX. 2012, Page 39 of 207
Adobe v. Jaffe, IPR2024-01352

about. This is in paragraph 98.

Q. Okay.

A. So let me just read the first sentence. It says, "The specification explains, however, that during operation of the camera, internal security 14 is monitored to detect the integrity of the tight coupling of the sensor set and the recorder 6."

That's what you just -- just pointed me to, right?

Q. Right.

So what -- what does it mean to say -- when it says that "internal security 14 is monitored to detect the integrity of the tight coupling of the sensor set and the recorder 6"?

A. Yeah. So I will refer you to the remaining of -- sentences of paragraph 98. May- -- maybe I should just read them, you know, for the recorder.

So "Furthermore, during prosecution, the applicants added the 'monitoring' step to overcome a rejection and then argued that the added limitation 'means that, for example, a signal is generated if the device that prevents physical access to the interconnections between the sensor set and memory is broken. They asserted that 'no prior art references of record...contains any disclosure of this subject

matter.'"

So then you go on to paragraph 99, it says, "In the district court's tentative claim construction order, the judge determined that 'monitoring the integrity of the tight coupling between said memory and said sensor' means 'determining whether physical access has been gained to the coupling between said memory and said sensor.'"

So I summarize in the following sentence, "In light of the specification and the applicants' statements in the prosecution history, I agree that a POSITA would interpret this term as stated in the court's tentative ruling. Thus, for purposes of my analysis of the challenged claims, I understand that 'monitoring the integrity of the tight coupling between said memory and said sensor' means 'determining whether physical access has been gained to the coupling between said memory and said sensor'."

That's what -- what I mean by the sentence you pointed to earlier.

Q. Okay. What is physical access to the coupling between the memory and the sensor? What does that mean -- what does "physical access" mean?

A. Plain and ordinary meaning.

Q. Okay. What's the plain and or- -- plain and

ordinary meaning of physical access?

A. Physical access. "Access" means obtaining that information --

Q. Okay.

A. -- physical.

Q. So the monitor has to determine whether -- whether access to the -- to the information has been gained between the coupling between the memory and the sensor?

A. I'm sorry.

MR. LIAW: Objection, misstates prior testimony.

THE WITNESS: Can you repeat that question?

BY MR. ATKINSON:

Q. So if "physical access" means gaining access to the information, does this require determining whether the -- the information transmitted in the coupling between the memory and the sensor has been physically accessed?

A. Again, I'm just going back to paragraph 100 of my declaration. We are talking about the meaning of monitoring the integrity of the tight coupling between said memory and said sensor, and my conclusion is that it means determining whether physical access has been gained with the coupling between said memory and said

sensor.

Q. Okay. And let -- let me see if I -- if I have that right.

So your understanding is that "physical access" means gaining access to the information in the coupling; is that right?

A. What do you mean by "information in the coupling"? Can you elaborate on that?

Q. Well, I -- I thought I was repeating what -- what you said.

What does "physical access" mean again?

A. Yeah. It's access, physical. That's the plain and ordinary meaning.

Q. So gaining physical access to the coupling between what -- what -- what -- what hap- -- like, what is an example of gaining physical access to the coupling between the memory and the sensor?

A. So if I point you to 97 of my declaration, yeah, the third line, it says, "If said integrity is compromised," and that's one example of physical access.

Q. Right.

So what -- so I'm -- I'm just trying to understand what "physical access" means.

A. One example, I just said, it is when the integrity to the coupling is compromised.

JAFFE EX. 2012, Page 43 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Okay. And what does that mean?

MR. LIAW: Objection, vague.

BY MR. ATKINSON:

Q. What does -- when the integrity of the coupling is compromised, what is -- what is -- what is an example of -- of the integrity of the physical coupling being -- being compromised?

A. If you look at the Claim 1 of the patent, later claim elements stated that, right?

THE COURT REPORTER: I'm sorry. What stated that?

THE WITNESS: Later claim elements stated that the said stored data stream is not authentic when the --

THE COURT REPORTER: I'm sorry. We have to do something about the audio. I'm not getting his testimony.

MR. ATKINSON: Okay. Yeah, we've been going about an hour. We can take a break.

(Inaudible audio feedback.)

THE VIDEOGRAPHER: We're -- we're going off the record at 12:04.

(Brief recess taken.)

THE VIDEOGRAPHER: Okay. We're back on the record at 12:34.

BY MR. ATKINSON:

Q. Dr. Xiong, would you mind turning in the prosecution history, Exhibit 1002, to page 283, please?

A. Which page again, you said? I'm sorry.

Q. 283.

A. 283, yes.

Q. So have you seen this -- this office action before?

A. Yes.

Q. And did this office action follow the -- the amendment that we looked at earlier from page 277?

A. Yes.

Q. Okay. And if you'll -- and you see on page 283 it refers to a -- a Schipper patent, US 5,764,770, and a Maloney patent, US Patent 6,253,337?

A. I see that, yes.

Q. Have you reviewed either or both of those two patents?

A. No, I haven't.

Q. Okay. So those patents were -- were not -- were not references you considered in forming your opinion in -- in your declaration? Do I have that right?

A. I didn't consider these -- these two patents, that's correct.

JAFFE EX. 2012, Page 45 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Okay. Okay.

And if you'll turn to page 292 of the prosecution history.

A. Yes.

Q. So you see where it's discussing the amended claims where it's adding the limitation "utilizing a sensor which is" -- or -- or it's dis- -- I'm sorry -- where it's discussing the -- this limitation, "utilizing a sensor, which is tightly coupled to said memory, to generate at least one internal and unique parameter"?

A. I see that sent- -- I see that sentence, yes.

Q. And then you see at the end it says, "Thus, in accordance with the present invention, the claimed 'tight coupling' requires that the connections between the sensor and the memory not be physical-" -- "physically accessible to a user"?

A. I see the sentence.

Q. Okay. Is there any discussion in this page or the surrounding -- or in this sentence or in the surrounding text regarding connective traces or leads?

A. You mean on this paragraph or this whole page of 292?

Q. Either.

A. I don't see that on this page 192 [sic] of Exhibit 1002.

JAFFE EX. 2012, Page 46 of 207
Adobe v. Jaffe, IPR2024-01352

Q. And do you see on -- I guess that's the -- one, two -- the fourth sentence that starts with "On the contrary..."

In the -- in the -- in the second full paragraph where it's discussing the -- the Maloney patent, do you see where it says that the sensors can be local or remote?

A. I see the sentence there, yes.

Q. Okay.

A. But this is Maloney. Again, it's not part of my analysis or my declaration.

Q. Okay. Would you consider -- did you consider this office action -- I'm sorry.

Did you consider this amendment in -- in reaching your conclusions regarding the claim construction?

A. Can you repeat the question?

Q. In reaching your opinions regarding the -- the -- the -- regarding claim construction for the -- for the '828 Patent, did you consider this office action? I'm sorry. Did you consider this amendment? I misspoke.

A. Again, I didn't review Maloney, and looking at it now, even, you know, reading this, I don't think that would change my opinion in my declaration. This is --

JAFFE EX. 2012, Page 47 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Did you consider this -- this amendment in reaching your opinions?

MR. LIAW: Asked and answered; objection.

THE WITNESS: As I mentioned, I didn't consider -- I didn't review Maloney, and -- you know, before I finished my report. Now you're pointing this to me; this is Maloney. This is different from the '82 Patent -- '828 Patent. So I -- in looking at this --

BY MR. ATKINSON:

Q. We may be -- we may be talking past each other.

So I understand that you didn't review Maloney. Did you review this -- this amendment in reaching your claim construction opinions, the -- the page 92 -- or page 292 of the prosecution history?

A. I don't recall reviewing this before my -- submitting my declaration.

Q. Okay. If you'll turn to page 293.

A. The next page?

Q. Yeah.

Do you see where it quotes -- you see the quote regarding the monitoring step at the beginning of the page from -- from the claim language?

A. From the claim language of the '828 Patent?

Q. Yes.

A. Yes, I see that.

JAFFE EX. 2012, Page 48 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Okay. And you see the following paragraph, the second sentence, where it says, "This means that, for example, a signal is generated if the device that prevents physical access to the interconnections between the sensor set and memory is broken"?

A. I see the sentence.

Q. Okay. What is physical access to the interconnections between the sensory set -- between the sensor set and memory?

A. Again, are you -- are we going back to the '82 Patent -- '828 Patent or the Maloney here?

Q. Well, so the -- this -- this is the prosecution history for the '828 Patent.

A. Okay. Can you repeat the question again?

Q. Do you have an understanding of what -- of what it means to -- to gain physical access to the interconnection between a sensor set and memory?

A. You mean tight coupling in the context of '828 when you say the connection?

Q. So the sentence here says, "A signal is generated if the device that prevents physical access to the" -- "the interconnections between the sensor set and memory is broken."

Do you see that?

A. Yeah, I see the sentence here.

JAFFE EX. 2012, Page 49 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Okay. What is physical access to the interconnections? What does that mean to have physical access?

A. Here it doesn't -- it's says it's to prevent the physical access to the connection. That doesn't say that, you know -- I mean, the physical access is obtained. It's to prevent that.

Q. Right. So it prevents physical access?

A. Right.

Q. If -- if I had -- if I gained physical access, what would that mean -- what would -- what would that mean, to -- to gain physical access to -- to the interconnection?

A. There are many different meanings. I mean, on the top of my head, I -- I -- this is not what the sentence -- the sentence that -- that -- the sentence, as I mentioned, is to prevent that.

So you are talking about what does physical access mean. It doesn't say what -- what, I mean, physical access means.

Q. Right.

So we'll -- so, for example, the door -- a locked door prevents physical access to a room, right?

A. Again, this is a hypothetical, you know, situation. I -- I -- you know, I don't have any

JAFFE EX. 2012, Page 50 of 207
Adobe v. Jaffe, IPR2024-01352

opinion.

Q. Well, so if we're preventing physical access to an interconnection, what is physical access to the interconnection? That -- what was it that we're preventing?

A. Preventing physical access.

Q. Right.

So what is physical access?

A. Again, on the top of my head, there are many example of physical access. So sitting here --

Q. Give me -- can you provide me some examples of physical access to an inter- -- to an interconnection?

A. I mean, if you go back to my report, I can point to you one example, and if I point you to, say, paragraph 57, the last part of -- are you with me -- page 25?

Q. Oh, I'm sorry. I went to page 57.

A. Paragraph -- paragraph 57.

Q. Wait. I'm sorry. Hold on. Let me get there.

A. Yeah, page 25.

Q. Okay. I'm there.

A. Yeah. The last part of the paragraph 57, the patent states that -- the patent specification states that “there can be nothing that can possibly alter the recording before the authentication..."

JAFFE EX. 2012, Page 51 of 207
Adobe v. Jaffe, IPR2024-01352

So altering the recording would be one example of causes of physical access.

Q. Are there any other examples beyond altering the recording that would -- that would -- that would cause physical access?

MR. LIAW: Objection; misstates prior testimony.

THE WITNESS: Yeah. This, again, goes, you know, outside the scope of my report. On the top of my head, I -- I -- I don't have an answer.

BY MR. ATKINSON:

Q. Would -- would reading without altering the -- the recording be an example of gaining physical access?

A. Again, this is a physical -- I mean, hypothetical scenario. I -- I don't know. I haven't considered that.

Q. Okay. So it's your opinion that recording would be physical access and you don't know whether merely reading would be physical access?

A. Again, I -- I answered your question earlier. I don't know. I haven't considered that -- your hypothetical scenario in my declaration.

Q. What if you opened the computer case but neither recorded nor -- nor accessed the information? Would that be gaining physical access?

JAFFE EX. 2012, Page 52 of 207
Adobe v. Jaffe, IPR2024-01352

A. Again, this is a very hypothetical scenario. I -- I -- I have the same answer of, you know, don't know.

Q. So the only example sitting right here that you know of for gaining physical access would be altering the information recorded?

MR. LIAW: Objection; misstates prior testimony.

THE WITNESS: I'm not saying that. And I just gave -- gave one example.

BY MR. ATKINSON:

Q. Okay. Do you have any -- do you have any other examples sitting here right now?

A. I have to think about it --

Q. Okay.

A. -- if you give me time.

Q. So why -- why don't you think about it, and let me know if you have any other examples.

A. (Witness examines document.)

Q. Are you still thinking, Dr. Xiong, or is -- have you come up with any other examples of physical access, other than altering the recording?

A. Yeah, I'm still thinking. Just give me a little more time. I'm close to coming up with an example.

Q. Okay. How much -- how much more time do you

JAFFE EX. 2012, Page 53 of 207
Adobe v. Jaffe, IPR2024-01352

think you'll need?

A. I'll give you another example, as I mentioned. Altering the recording of the scene is one example.

For example -- another example is change the camera ID or the -- for example, the date and time of a GPS. This is all different examples.

Q. Okay. So other than changing information, are there -- other than examples of changing information, are there any other examples that would -- that would constitute physical access?

A. Again, off the top of my head, if you want to give me time, I -- I have to think about this.

Q. Well, let me put it this way: Is the only -- is the only -- is the only place that you can think of that would constitute physical access that you've thought of so far involve altering or changing pieces of information?

A. Can you repeat the question?

Q. Are -- so the -- would it be fair to say that the only -- the only examples of gaining physical access that you've been able to come -- come up with so far involve altering or changing information between the sensor and the memory?

A. I wouldn't agree to that in general. There are other examples. I just -- you know...

Q. But you haven't been able to come up with -- with the other examples that don't involve altering or changing information as you sit here right now; is that right?

A. That's correct.

Q. Okay. And if you will turn to page 314 of the prosecution history.

A. Yes, I'm at, yeah, page 314.

Q. So this -- is it your understanding that this is the Notice of Allowance that -- that preceded the issue of the '828 Patent?

A. Yes.

Q. Okay. This Notice of Allowance followed the -- the preceding amendment that we just looked at; is that correct?

A. Correct.

Q. Okay. All right. If you'll -- you can put the prosecution history away for a second.

If you'll turn back to the '828 Patent, Exhibit 1001 --

A. Yes.

Q. -- if you'll turn with me to column 7, line 25 to 34.

A. Yes.

Q. You see where it references MD5?

A. Yes.

Q. Is MD5 a signal for protocol?

A. It's one of them.

Q. What does -- what does MD5 do, in general?

A. If you look at the sentence after, MD5 says, "The digital signature, which is a function of the signature protocol being used and the block, is computed and made part of the file."

So it promotes an input file, like a data stream, into a fixed length. We call this hash. And that's a good explanation of what MD5 does.

Q. So is -- MD5, is it a hashing function, or how would you describe it?

A. It's one example -- one other examples of hashing function.

Q. Okay. And what does MD5 take as inputs, and what does it output?

A. It's any digital file, any length. It could be recording an image, a file, or even a video or text file. An output is a fixed-length stream; we call it hash. It could be 128, for example, bits long.

Q. Okay. And what do people use M- -- the MD5 hashing for?

A. I'm sorry. Is it -- can you repeat the question?

Q. What do people use MD5 hashes for?

A. One example would be authentication.

Q. Okay. Can you explain?

A. So can I point you to paragraph 64 of my declaration, page 31? And the following page here, on page 2, I'll start with paragraph 64.

Q. Okay.

A. So it says, "The digital signature is generated using a signature protocol, such as the commercially available MD5. Though it's not limited to the MD5. The patent does not describe MD5, but a POSITA in Year 2000 would have known that MD5 is a one-way hash function, commonly used in cryptography and data processing."

And I'll -- looking forward, maybe the second sentence of the next paragraph, it says, "An MD5 hash function generates a 128-bit hash value, regardless of the size of input. This type of function is referred to 'one-way' because it's effectivity impossible to determine the input based on the output hash value."

So let me just go on to paragraph 66, "A one-way hash function, like MD5, is useful as a signature protocol in the context of the '828 Patent because if the same image or other type of input is provided to the hash function and will always produce the same output value, as illustrated in the first

figure on page 32."

I can quickly go through this figure. We have two identical images with a star, and the same hash function, such as MD5, will generate the same hash value. In this case, I have 3639999. So if we go to this -- two images are the same; hence, their hash values are the same.

Then the next paragraph, I said, "However, if any change is made to the image, even a single bit, the resulting output hash value will be completely different, as shown below."

So in this second figure on page 32 of my declaration, you can see the second image in the center has a small difference with a white star -- small white star inside of the -- you know, the bigger black star versus the first image, just a big black star.

So these two input images are slightly different, and then you can see the hash function will generate two completely different hash values, and this is a way to, you know, authenticate these two images. Because if you look at these two ha- -- different hash values, you will immediately know the two images are different on the left-hand side.

Q. Okay. Are there other algorithms for creating digital signatures beyond MD5?

JAFFE EX. 2012, Page 58 of 207
Adobe v. Jaffe, IPR2024-01352

A. Can you repeat the question?
Q. Would a person of ordinary skill in the art know of other algorithms for producing digital signatures, besides MD5?
A. Yes.
Q. What are some other examples of functions for creating digital signatures, besides MD5?
A. Do you want an example?
Q. Yeah.
A. The commonly used one would be the secure hash function, SHA, either 128 or 256.
Q. Okay. Are there any -- are there any others you can think of off the top of your head?
A. There are others, but the ones I gave, the HA-- you know, SHA, secure hash 128 or 256 are the most commonly used ones.
Q. Okay. If you'll turn back to the '828 Patent.
A. Yes.
Q. If you'll turn to column 8, lines 10 to 12.
Do you see that sentence, "A tightly coupled image 146 and signature are the minimum required elements for the Signa2 process"?
A. I see that.
Q. Okay. Now, Signa2, is that the -- is that the files created by the hash function that we were just

talking about, or do you know?

A. I can point you to bottom of column 7 --

Q. Okay.

A. -- of the '828 Patent, and that's the one that first mentions this Signa2 file format.

It says, "Referring to Figure 7A, the files created by the Signa2 process are in a format generally accepted by the industry. Most specifically, the Signa2 files are not proprietary. Additional information is contained within the file, but the addition of the information is in compliance with the standards for the format."

Q. So does Signa2 create the signature?

A. The Signa2 here, as I just cited earlier in the paragraph of -- of column 7, is a file format.

Q. The signature is a file format?

A. Signa2, yeah, is a file format. That's what it says here.

Q. So the -- the signature isn't actual information; it's the format for information?

A. No. I'm sorry. Can you repeat the question? Are you saying "signature" or "Signa2"?

Q. No, no. I -- I'm sorry. We may be -- we may be -- let me -- let me move closer to the mic.

So does Signa2 create the signature 145?

A. The short answer is "no," as I mentioned.

Signa2 is a file format that is generally accepted by the industry.

Q. Okay. And what does -- what does the Signa2 process produce?

A. Is a file -- digital -- for example, digital image file that is compliant to the Signa2 format that is generally accepted by the industry.

Q. Okay. And what -- what -- what does that file format do?

MR. LIAW: Objection, vague.

THE WITNESS: About the -- I don't understand the question.

BY MR. ATKINSON:

Q. Well, I -- I -- the problem is I don't understand the answer.

So if Signa2 produces a file format, what -- what -- what's the purpose of the file format that's produced?

A. The file format facilitates interoperability among different industries.

Q. Okay. And is this an image file format?

A. It's -- it works for images. On the top of my head, I do not whether it also applies to other recordings, such as audio or video. So it at least

JAFFE EX. 2012, Page 61 of 207
Adobe v. Jaffe, IPR2024-01352

applies to images.

Q. Okay. And it says in that sentence at -- in column 8, starting at line 10, it says that there is -- that it has a tightly coupled image 146 and signature 145.

You see that?

A. I do.

Q. So image 146, that -- that's data; is that correct?

A. It's image data.

Q. Okay. And signature 145, that's -- that's also data, although not necessarily image data; is that correct?

A. It says the signature.

Q. Right.

What is signature? Is it -- is it data, or is it a physical thing?

A. It consists of data disk. It's a signature disk.

Q. Okay. So since the image is information and the signature is also information, how can those pieces of information be tightly coupled?

A. Here "tightly coupled" is just in a different context.

Q. Okay. So it talks about tight coupling here.

JAFFE EX. 2012, Page 62 of 207
Adobe v. Jaffe, IPR2024-01352

It would not require connective leads or traces?

A. Again, as I just mentioned, right, this is a different context of the tight coupling we had talked about earlier in Claim 1.

Q. Right.

So when it talks about tight coupling between image 146 and signature 145, that wouldn't refer to connective leads or traces; is that right?

MR. LIAW: Objection; misstates the record and the evidence.

THE WITNESS: As I mentioned in here, this sentence is talking about -- I can read the sentence again -- tight coupled image and signature, not in the context of tight coupling of the sensor and the memory in the context of Claim 1.

BY MR. ATKINSON:

Q. So would connective leads or traces be involved in this, in this context?

A. Again, this is a different context, so I don't know -- I didn't offer any opinion in terms of whether they're -- they're conductive leads or -- or -- or traces in this context. So I have no opinion.

Q. Would a connection by a bus in a computer be a connection by electrical lead or trace?

A. Again, this is a hypothetical scenario. I don't understand what you mean by the -- by the question. You said -- can you repeat the first part of the question?

Q. Are you familiar with the -- with buses in -- in computers?

A. Yes, in general.

Q. Okay. So what -- what's one example of a bus that you can think of off the top of your head?

A. Again, under what context?

Q. It's like in a -- in a -- in a computer.

A. In a computer, many examples. You have two components, and then there's a -- the bus connection in between. That's -- that's one example.

Q. Okay.

A. This is a hypothetical scenario that is not in my -- my declaration or report.

Q. So you don't have an opinion about whether buses would be connective leads or traces?

A. Not within the context of -- of Claim 1 of the '828 Patent in my report.

Q. What about cables? Would cables be connective leads or traces?

A. I have the same answer. I don't have any opinion in this hypothetical question.

Q. Let's see. Would you turn back to Figure -- hold on; I'm sorry -- Figure 1 of the '828 Patent?

A. The one we looked at earlier before the break?

Q. Yeah, yeah, the '828 Patent, Exhibit 1001, Figure 1, which is on page 2 of the exhibit.

A. Yes.

Q. You will see -- you see a line between 254 and the computer 252 -- GPS 254 and computer 252; you see that?

A. Yes.

Q. Is that line a connective lead or trace?

A. Again, without the context, this is not in my report, and -- and I have no opinion.

Q. Okay. What about between the camera 255 and the computer?

A. What -- what about that?

Q. The one about the connection between the camera 255 and the computer, would that be a connective lead or trace?

A. Again, the same answer.

Q. Okay. If you'll turn to Figure 2A --

A. Yes.

Q. -- you see a line between the -- the flash generator and the processor. Is that line also a connective lead or trace?

JAFFE EX. 2012, Page 65 of 207
Adobe v. Jaffe, IPR2024-01352

A. I'm sorry. Which one -- which line are you talking about?

Q. So you see flash generator next to 30?

A. 30, yes, I see that. Yes.

Q. You see the line between the flash generator and the processor?

A. You mean kind of the zigzag line, like, a --

Q. Yeah, it goes out and down.

A. Yeah. Again, yeah, I have no opinion on that line.

My analysis on my report concentrates on the line between, again, the sensor and the memory, and that's --

(Simultaneously speaking.)

Q. So there's a line between the sensor set, 73, and processor, 157; is that right?

A. Yes.

Q. And your opinion is that that is a connective lead or trace?

A. Yes.

Q. Are there any -- are there any other connective leads or traces illustrated in Figure 2A?

A. The line between 157 and 142.

Q. Okay. Any others?

A. I -- I didn't offer an opinion on others.

JAFFE EX. 2012, Page 66 of 207
Adobe v. Jaffe, IPR2024-01352

Q. What about between 142 and 141? Is that a connective lead or trace?

A. I have no opinion on that one.

Q. Okay.

MR. ATKINSON: We haven't been going quite an hour, but it might be -- it might be a convenient time to take a break, if we wanted to.

THE WITNESS: Okay. That's okay with me.

THE VIDEOGRAPHER: Everybody stand by.

We're going off the record at 1:21.

(Lunch break taken.)

THE VIDEOGRAPHER: We're back on the record at 2:27.

BY MR. ATKINSON:

Q. Dr. Xiong, would you mind turning in your declaration, Exhibit 1003, to paragraph 170 on page 74?

A. Yes.

Q. And here you're referring to the Glass reference, which I believe is Exhibit 1005; is that correct?

A. Yes.

(Exhibit 1005 was marked for identification.)

BY MR. ATKINSON:

Q. And in paragraph 170, you -- you point to

optics in camera 6, and you say that that includes a sensor; is that correct?

A. That's what the first sentence of 172 says.

Q. How do you know that optics in camera 6 includes a sensor?

A. I'll point you to this Exhibit 1005, right, column 4.

Q. Okay. Let me get there. Okay.

A. So if you start with line 55, it says -- or let me start with line 54.

This is -- the whole paragraph, right, is about description of Figure 2 that is in my report, page 170.

Q. Okay.

A. Line 54 says -- in the middle says, "There is a separate imaging 54." That's the system, right, that is in that dotted box. Again, I'm going back to my report, page 74, to that Figure 2.

Are you with me?

So here, the image system, right, that's right there inside the dotted box that contains the Unit 6, that's optics and camera, and Unit 8, digitizer and frame store. So that's what this refers to.

And now I'm going back to line 55, "The imaging system contains a camera 6 with associated

JAFFE EX. 2012, Page 68 of 207
Adobe v. Jaffe, IPR2024-01352

optics or other sensor."

So this is where I basically say the optics on camera 6 includes a sensor.

Q. Okay.

A. The spec says, "Camera 6 was associated optics or other sensor," which implies the optics in the camera has a sensor.

Q. Okay. And when you point to the digitizer and Frame Store 8 -- when you say that digitizer and frame store 8 includes memory, how do you know that the digitizer -- digitizer and frame store 8 includes memory?

A. So when you go to column 4 and then line 60, that says, "We prefer to provide a digitizer and memory for frame store."

So here, we have frame store -- just like at word itself -- means a storage for frame, but the specs further has the word "memory" or "frame store." So that's how I know.

Q. Okay. So that -- that sentence is how you determine that the digitizer and frame store includes memory?

A. Right, how I basically, you know, lead to this conclusion that a frame store includes memory. It's a storage for frame.

Q. Okay. The next sentence, you say, "An arrow from optics in camera 6 to the digitizer and frame store 8 indicates that they are connected by electrically conductive leads or traces, most likely on a circuit board, inside imaging system 4."

Where -- where's your support for this statement? Where -- where do you find the Glass reference indicating that the arrow means that optics in camera 6 and digitizer and frame store 8 are connected by electrically conductive leads or traces?

A. And just, again, I can repeat the sentence. I started with an arrow. That's the arrow from Unit 6 to 8 inside the imaging system in Figure 2, which means they are connected, and then because -- we're talking about a camera. The imaging system is a very small space, and it has to be -- the two components, if they are connected, has to be connected through, what I'll call again, conductive leads or traces on a circuit board.

Q. Where in the written description of Glass does it talk about conduct- -- conductive leads or traces?

A. Go further down to -- let's start with paragraph 171 of my report.

Q. Oh, I'm sorry. Let me turn to your report. I was -- I was on the patent.

JAFFE EX. 2012, Page 70 of 207
Adobe v. Jaffe, IPR2024-01352

A. Page 74 --

Q. Okay.

A. -- where I started citing Figure 3, and that's in page 75. In that whole Figure 3, you can see that, you know, there's this whole outside, sort of -- this camera system, right, is inside this. This is called -- the box is called tamper-resistant/responsive packaging.

So in the middle of this -- this second sentence of paragraph 171, it says -- I said, "Figure 3 shows optics, imager, and digitizer and frame store. They are electrically connected together within an imaging system, which itself is contained in a tamper-resistant/responsive packaging. The figure illustrates a 'data path' connecting these components," namely a sensor or memory."

So this data path from the sensor to memory indicates that the components are electrically connected by conductive leads or tracers within imaging system 4, as I just explained. Therefore, the sensor and memory are tightly coupled, based on the construction of the term, and I discard -- discussed it earlier, and I think -- go on to the next two pages.

Q. Oh, well, so -- I mean, let's stop right there and kind of parse it.

So in -- in -- in the sentence that talks

JAFFE EX. 2012, Page 71 of 207
Adobe v. Jaffe, IPR2024-01352

about the data path, you cite the Glass reference at column 5, lines 46 to 48; is that right?

A. I'm sorry. Can you -- you're pointing to which lines again?

Q. In -- in your report, you cite to -- in -- on page 75, you cite to the Glass reference at column 5, lines 46 to 48?

A. That's correct, yes.

Q. Where in lines 46 through 48 does it talk about either -- either an electrical connection or a connection by conductive leads or traces?

A. Yeah, I didn't -- it's in column 5 -- are you with me --

Q. Yeah.

A. -- column 5, I believe lines 46 to 48.

Q. Yeah. So I don't see electric- -- either the words "electrically connected" or "conductive leads or traces" in those lines.

A. The line says, "Preferred configuration of our imaging system is shown in FIG. 3 wherein data paths are shown in solid lines and control signal paths are indicated by dotted lines." And then, it goes on and says, "Optics 41 direct light from a scene to an imager which may be a CCD camera," and all that.

So in my report, I said the figure

JAFFE EX. 2012, Page 72 of 207
Adobe v. Jaffe, IPR2024-01352

illustrates a data path connecting these two components.

Q. So is every data path in -- in every system a conductive lead or trace?

A. I'm sorry. Can you repeat the question?

Q. So is it your opinion that a data path is a conductive lead or trace -- all data paths are conductive leads or traces?

A. No, that's not what I said in the -- in the report or in this deposition, no.

Q. Okay. So what -- what makes this data path a conductive lead or trace?

A. When you said "this data path," which one are you talking about?

Q. The data path from -- well, the one you're pointing to, is -- the data path between the imager and digitizer 42 and frame store 43, I believe.

So what -- what makes that data path a conductive lead or trace?

A. That's one, again, I can read on the sentence, right? Right below Figure 3 on page 75: Figure 3 shows that the optics, imager, and digitizer, right, and the frame store are electrically connected together.

Q. Okay. Let's stop right there.

Where does it say that the -- that those things are -- are electrically connected in Glass?

JAFFE EX. 2012, Page 73 of 207
Adobe v. Jaffe, IPR2024-01352

A. Well, I can look at both -- actually, all these components. Let's focus on the imager and -- and digitizer and the frame store. They're inside this tamper-resistant/responsive packaging, and they are connected because of the small space. The only way this connection can be made is through a -- conductive leads or traces.

Q. Okay. So electrical connections are -- in a computer are by -- are by conductive leads or traces?

MR. LIAW: Objection; misstates prior testimony.

THE WITNESS: Can you repeat the question?

BY MR. ATKINSON:

Q. An electrical connection in a computer or digital device is a -- is one that's by an electrical -- is one that's by a conductive lead or trace?

A. The answer is no, and that's not what I said in this -- this sentence in my report.

Q. Well, how do we know that this data path that you're pointing to is either an electrical connection or, more specifically, a connection by conductive leads or traces?

A. As I just mentioned, both components are inside this tamper-resistant and responsive packaging unit, which is very small, and you can see -- okay, the arrow

-- next to the arrow, again, in Figure 3 says "imaging." That's the imaging data, and from a POSITA's point of view, the only way these two can be connected is through a conductive wire lead.

Q. Could they be connected by a cable?

A. Again, I want to be very specific. The connection between the digitizer and -- an imager and the digitizer block and the frame store block in Figure 3 can only be connected through a conductive lead or trace.

Q. Why can it only be connected by a conductive lead or trace?

A. Because, as I mentioned, all these components are within this tamper-resistant packaging system inside the small camera. So it's a very, very small space.

The only way to connect these two components that is so close to each other is through a conductive lead or trace.

Q. Well, I mean, wires do -- like, a -- a cable doesn't necessarily take up a lot of space either.

Couldn't it be connected by a cable?

A. As I mentioned, in this case, you're talking about a very, very small space. The only way to connect these two components is to use either a conductive lead, as we talked about, or the trace or the lead wire.

JAFFE EX. 2012, Page 75 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Where does -- where in the -- in the Glass surface does it say that the space is small?

A. You're talking about a camera inside this tamper-resistant packaging.

Q. Right.

A. This packaging that's inside the camera is a very small unit.

Q. Where does it say that it's a small unit?

A. Look at your -- the camera around 2- -- Year 2000, at that time, digital cameras were handheld. It's very small. It was in your hand.

Q. Okay. So if it's handheld, why -- why would it not be able to contain cables?

A. As I mentioned, you have a handheld device with different components. In this figure, the digitizer is right next to the frame store, so in other words, the sensor is right next to the memory, and the only logical way to connect them is through a conductive lead or -- or trace.

Q. Where does Glass indicate that the camera is handheld?

A. The POSITA, around Year 2000, at the time of the patent, will know this is the only way to make the connection, through a conductive lead or trace.

Q. Okay. Where -- where -- where are you finding

that information in Glass?

A. So maybe I should go on to paragraph 172 in -- in -- on page 76.

It says, "My opinion that Glass discloses utilizing a sensor, which is tightly coupled to said memory...," meaning I used the -- the claim construction of using the conductive wire or lead or -- the conductive leads or trace is further supported by the prosecution history.

Q. That's of the -- that's not of the Glass reference, though, is it; that's of the -- of the '828 Patent; is that right?

A. Then you go on to paragraph 173, it says -- or maybe just go on to page 77, the first line says, "Glass discloses the same arrangement with the same characteristics." The arrangement between Glass and the '828 Patent are the same.

And then I go on and I said, "Figures 2 and 3 in Glass show an imaging system that includes a sensor that is connected to said memory, as in Figure 2A of the '828 Patent."

Q. Okay. Well, let's -- let's -- let's move on to that.

So the -- Figure 2A doesn't -- does not illustrate a digital frame and store, does it?

JAFFE EX. 2012, Page 77 of 207
Adobe v. Jaffe, IPR2024-01352

A. If I can point to page 27 of my report, the last part of paragraph 27 [sic], I said, "This is the way" -- Figure 2A on this page, 27, right below it, I said: The figure identifies, of course, the sensor as the lens CCD, and then the POSITA would know that's the charged-coupled device, and that is used to capture the images, right, in a digital camera or similar devices.

Q. Right. I don't see anything here about digital frame image or store.

A. But if you look at the -- the sensor, right, it captures the -- the image, and the processor has memory to store it, and then there's a -- the floppy drive, we talked about this morning --

Q. How -- how do we know that the processor has memory to store it?

A. In order to process an image, the processor has to load the image into its memory.

And then, further, there is the recorder on Figure 2A that is Unit 142, right, this 3.5-inch floppy drive.

Q. So is the floppy drive a digital frame or store?

A. My report doesn't specifically say that, but there's memory, as I mentioned, right, both in the processor, and then the -- the image one writes to

JAFFE EX. 2012, Page 78 of 207
Adobe v. Jaffe, IPR2024-01352

the -- for example, the floppy disk, and that's the storage device.

Q. Okay. In Figure 2A of the '828 Patent, the connection's between the lens CCD, and the processor, and between the processor and the floppy drive recorder, those are -- those are lines, correct?

A. They are shown in Figure 2 as lines, correct.

Q. Right.

If we go back to -- I think it was Figure -- hold on.

If we go back to Glass, Figure 3, I believe it is, the connection between the -- the imager and the digitizer and frame and store is the line; it's an arrow, correct?

A. There is a line, an arrow, between Unit 42 and Unit 43 in -- in Figure 3 of Glass.

Q. So the connections in the '828 Patent are by lines, and the connection in Glass are by arrows, right?

A. That's just the way the figures are drawn. As you can see in Figure 3 of Glass, right, the photo is signaled by the arrow. That's just the convention. I -- I -- that is the way that --

Q. So -- so is it your -- is it your understanding that lines and arrows are the same thing?

A. I'm not saying that.

JAFFE EX. 2012, Page 79 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Okay. So there is -- there is a difference between the connection in Glass and the connection illustrated in Figure 2A of the '828, as depicted in the figures?

A. Are you talking about, again, the -- the connections, again, between Units 42 and 43 in -- in Figure 3 of Glass, and the line connections between, say, the laser -- lens CCD and the processor in Figure 2A of '828 Patent?

Q. Yes, yes. They're not -- they're not exactly the same because one is an arrow, and the other is a line without an arrow?

A. I would agree to that.

Q. You don't -- you don't think that one is an arrow, and the other is not an arrow?

A. On the surface, the -- that line between Unit 42 and 43 in Glass, Figure 3 of Glass, is indicated by an arrow. That's just the convention that Glass uses, if you look at the other lines in -- in Figure 3.

Q. Are all the lines illustrated in Figure 3 conductive leads or traces?

A. Again, we went through this similar question earlier this morning.

My analysis in this declaration only concentrates or focuses on the line or the connection,

JAFFE EX. 2012, Page 80 of 207
Adobe v. Jaffe, IPR2024-01352

like the pointed arrow, between Unit 42 and 43. I didn't offer any analysis or opinion on the other arrows or connections.

Q. Okay. So how do we know that this -- that this arrow is by connective lead or trace?

A. We went through this earlier, right, just in page 75 -- on page 75 of my report. I can read the sentence again. Says, "The illustrated data path from the sensor to memory indicates that components are electrically connected by conductive leads or traces within imaging system 4," and I explained my reasons earlier.

Q. If you'll look at Figure 3, on the right-hand side, you'll see a Comm Interface 49.

Do you see that?

A. You mean in Glass Figure 3?

Q. In Glass, yes, Figure 3.

A. I see Unit 49, yes, Comm Interface.

Q. And you see next to it there is a double arrow labeled "Host Comms"?

A. I see that.

Q. Do you know what the comm interface in Glass is doing?

A. Again, I -- this is not part of my report. I -- I -- you know, I included this, you know, in Figure 3

JAFFE EX. 2012, Page 81 of 207
Adobe v. Jaffe, IPR2024-01352

because I don't want to carve out the -- the upper-level portion of Figure 3. So I -- I don't -- I haven't performed any analysis on this component, so I don't have any opinion on it.

Q. Do you know what the host that's referred to is?

A. Again, I don't address this item that's called, you know, host in my report, so I -- I -- I don't have any opinion on top of my head right now.

Q. But Glass does -- does Glass talk about a host computer?

A. You mean -- where? You mean in -- in my report or my --

Q. With respect to Glass, does -- does Glass refer to host computer?

A. If you point to me in Glass where it addresses that, I can, yeah.

Q. Well -- so in column 4 to column 5, there's some references to a host computer.

Do you see those?

A. I see one here. For example, column 4, line 55, it says, "There's a separate imaging system 4, which is connected to the host computer."

Q. Okay. And is that the host that's referred to by the line outside the comm interface in Figure 3?

JAFFE EX. 2012, Page 82 of 207
Adobe v. Jaffe, IPR2024-01352

A. On top of my head, sitting here, no. I'm not sure. I have to -- to spend more time and -- and see if there's -- if there's a connection between the host computer and the host on -- on Figure 3.

Q. Would the connection between the host computer and the comm interface of the -- of the tamper-resistant package, would that be via connective lead or trace, or would that be by something else?

A. Again, my report doesn't say anything about the -- the -- whether -- I mean, that -- there is the connection between the host computer and this camera. I -- I know -- I don't -- yeah, I don't have an answer to your question.

Q. But it is illustrated using the same -- using -- using an arrow like -- like the arrow from the image and digitizer or the frame store; isn't that right?

A. I'm sorry. Could you repeat the question? What did you mean by --

Q. Well, the connection from the comm interface illustrate to the host is -- illustrated using an arrow similar to the arrow between the image and digitizer and the frame store -- is that correct -- in Figure 3?

A. Yeah. I'm sorry. Mr. Atkinson, which arrow are you talking about?

Q. I'm talking about two arrow -- arrows. There's

an arrow between the image- -- imager and digitizer of the frame store.

You see that arrow?

A. And that's the one earlier we talked about, and that is connected --

Q. Right. That's the arrow.

A. -- to the conductive leads or trace, okay.

Q. And there's also an arrow outside the comm interface with host comms; is that right?

A. Well, the -- the -- the arrow under the -- I mean, in between host and comms is a double, you know, headed arrow. I just want to point out the difference between the one now you're talking about and the one we talked about earlier.

The one that's directly --

Q. Does the arrow indicate the direction that communications can -- can go?

A. I would hazard to -- to -- you know, to guess. So I would say right now, on the top of my head, I don't know.

Q. Okay.

A. That's not part of my analysis.

Q. So do you know what any of the other arrows in Figure 3 do -- what -- what they indicate?

A. I'm sorry. Can you repeat the question?

JAFFE EX. 2012, Page 84 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Do you know what the arrows in Figure 3 generally indicate?

A. Again, this is not part of my analysis, so I -- I'm -- I don't opine about the arrows. So, again, I -- I don't have answers right now sitting here about the arrows.

Q. So the only arrow you know about is the arrow between the imager and -- imager and digitizer 42 and frame store 43?

A. That was where my analysis in this declaration was focused on.

Q. Where does it discuss the physical connection of that -- of that arrow in Glass?

A. I'm sorry. Can you -- you said where --

Q. Where in Glass does it discuss the physical nature of that arrow?

A. I have to -- if you point me to Glass, I can spend time and find it for you.

Q. Well, I think it's important because I -- I haven't found a description of it.

A. So if you look at column 5, lines 51 to 53, so "Consequently, we identify this component 42 as Imager & Digitizer. The digital image" -- and that's -- you see there's an image right next to an arrow. That's the digitized image from Unit 42, right -- "is sent to a

multiplexer 45 and/or a frame store memory 43."

Q. Right. It says it's sent there, but I don't see anything about the connection being -- like the nat-- how -- how -- I don't see anything describing how it's connected. All it says is that it's sent.

A. The connections are not in there. That's the arrow we were talking about between these two units, 42 and 43.

Q. Right.

But it doesn't describe how the -- the physical nature of the connection, does it?

A. It is sent. That's what that arrow means.

And as I explained earlier, because these two units are inside the small space within this tamper-resistant or responsive packaging, the only way this connection can be made is through a conductive lead or trace.

Q. Okay. I think -- well, so we're kind of going round and round.

But where -- where do you see in Glass a requirement that the -- that the -- that the space is small?

MR. LIAW: Objection; asked and answered.

THE WITNESS: As I mentioned, they were talking about most commonly handheld camera in the time

JAFFE EX. 2012, Page 86 of 207
Adobe v. Jaffe, IPR2024-01352

around 2000. They're very common.
BY MR. ATKINSON:
Q. Does Glass ever use the word "handheld"?
A. The POSITA would know.
Q. Okay. How -- why would a POSITA know that?
A. As I just mentioned, in the time frame of Year 2000 handheld computer- -- I mean, cameras are probably, you know, the most commonly used ones.
Q. Were there any non-handheld cameras at this time?
A. That's not relevant to the -- to the analysis. No, I just said the majority of the cameras around Year 2000 were handheld.
Q. Okay. So there -- there were non-handheld cameras in this time?
MR. LIAW: Objection; misstates prior testimony.
THE WITNESS: Again, that's, yeah, not part of the analysis. I'm focusing on the most commonly, you know, available cameras. They're handheld around year -- around Year 2000.
BY MR. ATKINSON:
Q. Most commonly, but not exclusively?
A. Again, in my analysis, I note this is tamper-resistant and responsive packaging. You are

talking about a very small space, and there are two components, right? There is better transmission, as I just pointed to you, in column 5, lines 40 -- or 52 or 54 -- right -- "a digital image is sent to a multiplexer 45 and/or a frame store memory 43."

To send the data between the two units in a small space, the only viable option -- I mean, viable solution is to use a conductive lead or -- or trace.

Q. Okay. But is there a description of that specifically in Glass?

MR. LIAW: Objection; asked and answered.

THE WITNESS: I'm sorry. Can you repeat the question?

BY MR. ATKINSON:

Q. Is there any specific -- is there any specific description of that connection in Glass --

MR. LIAW: Same objection.

BY MR. ATKINSON:

Q. -- of the physical nature of that connection in Glass?

A. I don't understand the question. On page --

Q. So there's a connection between the digital frame and store and the -- and the sensor, right?

A. That's the line in Figure 3, what we have been talking about.

JAFFE EX. 2012, Page 88 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Is the line in Figure 3 specifically described in Glass?

A. I gave you at least one place I just mentioned, and let me repeat.

Column 5, rows 50 -- lines 50 -- what -- 54 to -- yeah, 53 to 54 or 55. So the digital image is sent to a -- to a multiplexer 45 and/or a frame store in memory 43.

The POSITA would know --

Q. The word -- so all we have is the word "sent"?

A. I mean, that's just one indication. A POSITA looking at this sentence -- and Figure 3 is very clear the image, right, from the digitizer is sent to frame store, so this connection, and that's what this line is about.

Q. So any information that's sent in the device is by conductive leads or traces?

MR. LIAW: Objection; misstates prior testimony.

THE WITNESS: That's a very in-general statement. I -- I have no opinion.

BY MR. ATKINSON:

Q. Well, since all we have is the word "sent," how do we know that the word "sent" means by conductive leads or traces?

A. All I've been saying is that "sent" means there's -- there's going to be some way to send, and that's one of them. If you combine that sentence in the spec of column 5 with Figure 3, right, this all makes sense because this is how the image data from the digitizer is connected or sent to the frame store, and there's a solid line connecting that in such a small space. The only solution is to use a conductive lead or trace.

Q. Why is it the only solution?

A. Because this is the only way to -- to do it. I mean, in such a small space, there's no other -- other -- other solution a POSITA can -- could think of.

Q. But I think -- I think you -- you indicated earlier that there might be other devices that were not necessarily smaller and handheld, even if that was the -- the typical device.

A. I'm sorry. Can you repeat that again?

Q. Earlier you indicated that -- that, although handheld cameras might be the typical embodiment at this time for a camera, there could also be non-handheld examples as well.

Is that -- did I have that right?

A. Again, what I'm saying is that, in my analysis, when I wrote this paragraph, all I had in my mind, from

JAFFE EX. 2012, Page 90 of 207
Adobe v. Jaffe, IPR2024-01352

a POSITA perspective around Year 2000, was this handheld camera. I didn't ex- -- I wasn't --

Q. Were there any non-handheld cameras in existence at the time of Glass?

A. Again, around Year 2000, in my analysis, in terms of this paragraph, was, again, I had -- was based on a handheld camera in mind. It doesn't, you know, include or preclude the non-handheld cameras. That's -- that's -- I mean, it's just not really, you know, the point of the analysis. All the point is that you have these tamper-resistant or responsive packaging, and potentially, you will put all these components in Figure 3 in a small space. And then to make the connection between the Unit 42 and 43, right, for the image transmission, the only viable solution is to use a conductive lead or trace.

Q. Why couldn't you use a cable?

A. Again, cable is not part of my analysis, because this cable, I mean, you're talking about a long cable, and this is -- here we're talking about a --

Q. I didn't say long cable; it could be a short cable.

A. How short? Define how long is the cable you talked about.

Q. It could be very short. Sometimes they're as

JAFFE EX. 2012, Page 91 of 207
Adobe v. Jaffe, IPR2024-01352

small as, like -- you know, like, less than an inch.

A. So cable -- then what -- are you talking about how many wires? Is it just a single wire, or is it multiple wires in the cable?

Q. I don't know. I'm just saying that there -- there is such a thing as a small cable; is there not?

A. Well, if I -- the camera -- the cable typically has multiple wires; in this case, only one wire. So even your cable in your example is an inch; it's just a waste if you have multiple wires. Only used just one wire to make the connection. So this --

Q. So you could make a connection using a cable; isn't that right?

A. Again, this is a waste -- complete waste of material. So that's why I said if -- from a POSITA point of view, as I mentioned, a single wire suffices. A POSITA will not use a multi-wire, like, a thick cable, no.

Q. Why -- is it -- is it impossible or just non-preferable?

A. The only viable solution, as I mentioned here, is to use a conductive lead or trace. Very likely this whole system is built within a circuit board. The --

Q. You say "very likely." Very likely or certainty?

JAFFE EX. 2012, Page 92 of 207
Adobe v. Jaffe, IPR2024-01352

MR. LIAW: Let -- please let the witness finish answering.

BY MR. ATKINSON:

Q. Well, I -- so I -- I think it's important to determine whether we're talking about likelihood or certainty.

A. Well, I would say certainty.

Q. Okay. So it would be impossible to connect the -- the -- the sensor to the frame store by a cable?

MR. LIAW: Objection; misstates prior testimony.

THE WITNESS: Can you restate the -- the question?

BY MR. ATKINSON:

Q. It would be impossible to connect the imager and digitizer and the frame store via cable; is that your testimony?

A. Well, again, you have to be more specific. Like, how long is the cable? How thick is the cable?

Q. In any -- in any -- in any length cable, even if it's -- if it's short, you -- your testimony is that you cannot connect the imager and digitizer to the frame store by a cable in Figure 3?

MR. LIAW: Objection; misstates prior testimony. Asked and answered.

JAFFE EX. 2012, Page 93 of 207
Adobe v. Jaffe, IPR2024-01352

THE WITNESS: Yeah. That's not what I said.

BY MR. ATKINSON:

Q. Well, you said it was a certainty that it wouldn't be via cable, correct?

A. In this setting, correct.

Q. Is that because it's just non-preferable or because it's impossible?

MR. LIAW: Objection; asked and answered.

THE WITNESS: I already answered the question. The only solution is to use a conductive lead or trace.

BY MR. ATKINSON:

Q. Let's see. If we go to column 5, line -- well, it kind of gets a little bit off, but around line 20 to 23, it talks about this "tamper-resistant package being used to detect unwelcome intrusion and render the system useless."

Do you see that?

A. I'm sorry. Which one are you talking about? Where --

Q. In Glass, column 5 --

A. Okay, in Glass. Column 5, okay. Which lines?

Q. Lines, around, 21 to 23, I guess.

A. Okay.

JAFFE EX. 2012, Page 94 of 207
Adobe v. Jaffe, IPR2024-01352

Q. How does a tamper-resistant package detect unwelcome intrusion?

A. Are you asking me from reading these couple lines you mentioned?

Q. Well, in -- in Glass, generally, how does it -- how does the tamper-resist- -- resistant package in Glass detect unwelcome intrusion?

A. So I'll point you to -- to page 80 in my declaration, paragraph 181, second paragraph said, "In particular, Glass describes an imaging system, including the sensor and memory, 'enclosed in a tamper-resistant package 50, which will be used to detect unwelcome intrusion and render the system useless.'"

And I go on to say, "Glass explains that 'the entire package which contains the imaging system 4 be tamper-resistant so that it is extremely difficult to access the internal elements of the packaging" -- "of the package without detection or actual destruction of the device.'"

Q. Okay. So how is the tamper-resistant package detecting unwelcome intrusion? Like, what is it physically doing to detect that?

A. If you go on to page -- to 81, paragraph 183, and I said, "Glass states that 'the tamper-resistant package can be passive in that any opening to the device

will cause its ultimate destruction'."

In addition, "Glass also describes an alternative design in which 'the packaging could utilize at least one chassis intrusion detector or switch 51'," also in 53, and "switch 51 will signal the control logic 44 to return to a non-function" -- "-functioning state similar to that found during assembly."

And I'll stop at that.

Q. Okay. So what is Glass monitoring in order to -- in order to implement this tamper-resistant functionality?

A. Let me go on and -- and read on this paragraph 183. I said, "Glass explains that 'it is essential to ensure that the integrity of the acquired image and codes to be transmitted over the network have not been compromised.' Thus, Glass discloses monitoring the integrity of the tight coupling between said memory and said sensor (which means 'determining whether physical access has been gained to the coupling between said sensor' as discussed above)."

Q. Okay. So your -- is it your opinion that determining whether there's been physical access to the tamper-resistant package -- well, strike that.

Does monitoring the integrity of the coupling between the memory and the sensor require

determining whether physical access has been gained to the tamper-resistant package in Glass?

A. That's a long question, Counsel. Would you mind repeating that?

Q. Does monitoring the integrity of the coupling between the memory and the sensor require determining whether physical access has been gained to the tamper-resistant package in Glass?

A. Again, let me read this sentence. So this is the last sentence on page 81 of my declaration.

I said, "Thus, Glass discloses monitoring the integrity of the tight coupling between said memory and said sensor (which means 'determining whether physical access has been gained to the coupling between said sensor' as discussed above)."

Q. Where does Glass describe monitoring the coupling between the memory and the sensor?

A. As I stated in that previous sentence, determining whether physical access has been gained to the coupling between the sensor and the memory means monitoring the integrity of the tight coupling between said memory and said sensor.

And I can go on to paragraph 184, starting from the fourth line, I state that, "Glass teaches that the intrusion detection is in effect at all times, from

'after system software is loaded and enabled' until inclusion is -- "'intrusion is detected or the system software is reloaded using a special protocol'."

Q. Well, so, I guess my question is: Is Glass monitoring the -- the -- the package, or is Glass specifically monitoring the connection between the -- the memory and the sensor?

A. As I mentioned -- and I'll repeat the sentence -- the last sentence -- at the bottom of page 81, "Glass discloses monitoring the integrity of the tight coupling between said memory and said sensor (which means 'determining whether physical access has been gained to the coupling between said memory and said sensor.')"

Q. Okay. So what is it specifically monitoring? What is physically being monitored in Glass?

MR. LIAW: Objection; asked and answered.

THE WITNESS: So let me maybe read off the first sentence of paragraph 184. I said, "The Glass system monitors the integrity of the tight coupling between the memory and center" -- "and the sensor."

BY MR. ATKINSON:

Q. Okay. So is it your conclusion that Glass monitors the integrity of the coupling between the memory and the sensor, or is there a description in

JAFFE EX. 2012, Page 98 of 207
Adobe v. Jaffe, IPR2024-01352

Glass of specifically monitoring the coupling between the memory and the sensor?

A. As I stated, again, in the last sentence of page 81 in my declaration, "Glass discloses monitoring the integrity of the tight coupling between said memory and said sensor which means determining whether physical access has been gained to the coupling between the memory and sensor."

Q. But how does it determine whether physical access has been gained?

MR. LIAW: Objection; asked and answered.

THE WITNESS: Again, I can read the second sentence of paragraph 183 of my declaration, "Glass also describes an alternative design in which 'the packaging could utilize at least one chassis intrusion detector or switch 51.'"

BY MR. ATKINSON:

Q. Okay. So we have this chassis intrusion detector or switch 51.

What causes the chassis intrusion detector or switch 51 to -- to activate or switch?

A. Let me -- the first sentence of paragraph 183, "Any opening to the device" -- that could be one example -- "where it causes ultimate destruction."

Q. Okay. So is it your opinion that switch 51 is

JAFFE EX. 2012, Page 99 of 207
Adobe v. Jaffe, IPR2024-01352

triggered whenever there's some physical disruption to the tamper-resistant packaging, or is there some -- or does it specifically have to be an intrusion into the connection between the -- the -- the -- the frame store and the sensor?

A. Can you repeat the question?

Q. Does the triggering -- does -- the event that triggers 51, is it the intrusion of the tamper-resistant packaging, or is it -- or does -- or must it be a disruption of the connection between the sensor and the frame store specifically?

A. Again, because I still -- you mentioned two things. I mean, what's your question again? You mentioned one is --

Q. Well, there's a switch, right, 51?

A. Switch 51, yes.

Q. Is switch 51 triggered when there is a disruption to the tamper-resistant packaging?

A. Again, I'll just repeat my answer that I gave earlier. Any opening to the device where it causes an ultimate destruction and including the switch going off.

Q. So opening the device is what -- is what triggers switch 51; is that right?

A. It's just one -- one way -- one instance.

Q. What other instances are described?

JAFFE EX. 2012, Page 100 of 207
Adobe v. Jaffe, IPR2024-01352

A. Like, the simple one is to -- well, I mean, I'll go back to -- yeah, let me answer this in two parts.

First, one example is breaking the -- the connection image sensor and the frame store. So let me add in my answer to -- to that by citing -- let's see. Let's go to paragraph 181.

Q. Hold on. Is this in your declaration?

A. Yeah.

Q. Okay.

A. So there's plenty examples.

So the fourth line -- or the second sentence says, "Glass explains that the entire package which contain the imaging system 4 must be tamper-resistant so that it's extremely difficult to access the internal elements of the package without detection or actual destruction of the device," which means as long as --

Q. Let's just -- well, go ahead.

A. Let me finish. Yeah.

Access to the internal elements of the package, which includes, again, you know, access of the image you just mentioned. So this is plenty examples.

Q. Well, so, this is pro- -- this is stating the goal of -- of -- of making the package tamper-resistant,

JAFFE EX. 2012, Page 101 of 207
Adobe v. Jaffe, IPR2024-01352

but this doesn't say what must happen in order to trigger the switch indicating that there's been tampering, does it?

A. No. As I just ex- -- explained, this sentence, from a POSITA point of view, means any access to the internal elements of the package or trigger detection or destruction of the device.

Q. Right. And that -- that's through that switch 51, though, correct?

A. That's just one example. The sentence you see here --

Q. Are there other examples besides switch 51?

A. As I mentioned earlier, right, the chassis intrusion detector, that's another example, on the fourth line of paragraph 183.

Q. So where is the chassis intrusion detector illustrated in Figure 3?

A. It doesn't have to be illustrated. I mean, this is in the specs. I said at least one can be --

Q. Well, you -- you say it's in Figure 3 above.

A. No, no. I mean this is -- about -- that means after switch 51.

Q. Okay. So you don't think the chassis intrusion detector is illustrated in Figure 3?

A. Again, you know, this is not the main point of

my -- my analysis. All it says is that there's alternative designs, right, and there are different ways to do this.

Here the sentence says to utilize at least -- at least one. So it could be more chassis intrusion detector or switch 51. So there are a lot of ways to design, and this sentence says a lot.

Q. So where is the chassis intrusion detector described, other than in -- other than this switch 51, where is any chassis intrusion detector described in Glass?

A. I don't know. This sentence is -- do you want me to find this quote from -- from Glass?

Q. This is the only -- so as far as I can tell, this is the only description of the chassis intrusion detector.

A. This already describes it. This is the description in Glass. It's from Glass.

Q. Right.

So it's switch 51, or what -- if -- if -- if it's not switch 51, what is it? What -- and -- strike that.

If the chassis intrusion detector is not switch 51, what is the chassis intrusion detector?

A. Are you saying that the chassis intrusion

detector is 51? I don't understand your question.

Q. Well, so, that's what I'm trying to figure out. I was under the impression that the chassis intrusion detector was switch 51. You seem to be saying that you don't think that switch -- switch 51 is the chassis intrusion detector.

Do I have that correct?

A. I'm not saying that. I mean, again --

Q. What are you saying?

A. Okay. Let me make two points first. Okay. Whether the chassis intrusion detector is switch 51 or not is not the -- so the -- the main point of my, you know, analysis. Second -- and I'll make two more points -- the chassis intrusion detector could be a switch 51 or in a different detector, and here, second -- the third -- here the sentence says "at least one." There could be more than one, you know, detector. So there's a lot of possibilities.

Q. Okay. Is there any illustration of a chassis intrusion detector illustrated, other than, potentially, the switch 51?

A. As I mentioned, there's many different forms for this chassis intrusion detector to take.

Q. Okay. Where -- where do you describe the other forms of the chassis intrusion detector in Glass?

A. I'm sorry. Can you repeat the question?

Q. Where does Glass describe these other forms of the chassis intrusion detector?

A. Again, to me, this is already the description. This is from chassis -- from Glass. Let me finish my point.

First, there are more than one. Second, this chassis intrusion detector could be in the form of a switch or in a different form. So there are many, many different possibilities.

Q. Okay. Where are these other possibilities described?

A. Again, this -- -- Glass just gives different. For example, a warning sign, I mean, there are many different possibilities from a POSITA point of view.

Q. Do we have any designs in Glass other than the one depicted in switch 51?

A. The switch is already enough as an example, if you can -- if you agree that the chassis intrusion detector can take a form of a switch or a different form.

Q. Do you know if Glass describes the chassis intrusion detector anywhere besides this -- this reference in column 5?

A. Again, if you give me time, I'll find that

JAFFE EX. 2012, Page 105 of 207
Adobe v. Jaffe, IPR2024-01352

answer. Right now, sitting here, on the top of my head, I don't --

Q. Yeah. Well, I mean, so -- actually, it's probably time. We can take a break. I think we've been going a little bit more than an hour.

MR. ATKINSON: Do we want to take, like, a ten-minute break? And during the break, you maybe can look and see whether you see any other reference to chassis intrusion detector.

THE WITNESS: I -- I want to go to the bathroom, and, you know, I'm not sure I -- am I required, Counsel, to read the -- the patent to find out, you know, this during break?

THE VIDEOGRAPHER: Okay. Were y'all ready to go off the record?

MR. LIAW: Yeah, we'll go off the record.

THE VIDEOGRAPHER: All right. We're going off the record at 3:38.

(Brief recess taken.)

THE VIDEOGRAPHER: We're back on the record at 3:52.

THE WITNESS: You're muted. You are muted.

BY MR. ATKINSON:

Q. Sorry about that.

Dr. Xiong, before we went on break, we were

talking about the -- the chassis intrusion detector that's described in column 5 around lines 25 to 30.

Is there anywhere else in Glass where this chassis intrusion detector is described?

A. Counsel, I think I answered your question before the break. I can repeat that.

Q. Well, so I -- so where, other than this sentence in column 25 [sic], is the words -- are the words "chassis intrusion detector" used?

A. I didn't check, but first, I think one time, you know, mentioning from a POSITA's point of view is already enough. Because he or she will understand what this means. I already explained different possibilities. I didn't, you know, spend time to -- to review the patent and see other, you know, occurrences.

Q. Are you aware of any -- of any occurrences of -- of this language in Glass, other than this reference on column -- column 5?

A. The short answer right now sitting here, I don't know. I didn't spend time. If you give me time, I can review the whole patent and let you know.

Q. Sitting here right now, you're not aware of any other references?

A. No, I'm not saying that. I said I don't know whether there are other references in the patent.

JAFFE EX. 2012, Page 107 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Well, that's why I'm asking.

Are you aware, sitting here right now, of any references to this language, other than this specific reference in column 5?

A. Counsel, as I answered earlier, multiple times, sitting here right now, I don't have the answer for you. But if you give me time to review the whole patent, I -- I will be able to give you a definitive answer.

Q. Okay. All right. Let's see here. Let me get a -- let's turn to -- would you turn to paragraph 205 of your declaration, please?

A. Yes, I'm looking at it, Counsel.

Q. Okay. So you're describing the recording of bad or inauth- -- or not authentic images in log files; is that accurate?

A. I wouldn't agree completely with you. Bad is just one instance. It could be good, as well, in the log file.

Q. Right.

But in -- in -- in paragraph 205, specifically you're talking about the -- the bad indications?

A. Well, it started with -- the first sentence says "bad," but if you look at the second sentence, it says, "The POSITA would also understand a log file" --

JAFFE EX. 2012, Page 108 of 207
Adobe v. Jaffe, IPR2024-01352

well, now we're talking about in general, right? It could be good or bad in a log file and intended to be reviewed and read by the user.

So here, starting from the second sentence on, it's mostly about both because it generally talks about the log file, and that's why I initially answered your question in terms of not completely agreeing with you -- your characterization of this paragraph about, you know, bad only. It could be -- the log file can show both good and bad states.

Q. Will -- will the user know whether any specific image is good or bad until the user looks at the log file?

A. I'm sorry. Can you be --

Q. Will -- before the user looks at the log file, how will the user know whether any image is either okay or bad?

A. You're talking about the same user, right?

Q. Yeah, same user.

A. Not necessarily. That's the short answer.

Q. The user would not -- would not necessarily know until the user looks at the log file?

A. Yeah, there are instances. I mean, these log files are just one indication. There are cases the user know those are already -- knows, for example, the

JAFFE EX. 2012, Page 109 of 207
Adobe v. Jaffe, IPR2024-01352

package was broken, or maybe, on the example, before looking at the log, then he or she already knows.

Q. So let me see -- let me see if I understand what you're saying.

So you're saying that if the user knows that the package has been damaged, that it's bad?

A. I'm -- I'm -- I'm trying to answer your first question whether the user has to look at the log before he or she knows whether the image is good or bad. My answer is: Not necessarily.

One example is that if the user sees a broken package or any component in the sealed component before he or she goes to the log, that's an instance where, you know, the user already know the image is bad by looking at the broken package alone.

Q. But that -- that's not -- that's not something that's described in Glass, is it?

A. I was answering your question earlier -- first question.

Q. So -- but you're -- you're constructing a hypothetical that isn't described specifically in Glass; are you not?

A. I'm sorry. Can you repeat the question?

Q. You're constructing a hypothetical that's not specifically described in Glass; are you not?

JAFFE EX. 2012, Page 110 of 207
Adobe v. Jaffe, IPR2024-01352

A. Again, that's irrelevant. I was answering your question about whether a user has to look at the log to know whether the image is good or bad. I was answering your question.

Q. Okay. Well --

A. And my answer -- I'm sorry -- is that it's not necessarily. I gave that hypothetical as a scenario to support my answer.

Q. So once the device makes this good -- this okay or bad determination, how would a user determine whether that determination was good or bad without looking at the log file?

A. I think the two part of that -- well, your question is kind of contradictory. The first part you said the system already made the determination of good and bad. So there's already --

Q. Well, let -- let me -- let me clarify.

A. Okay.

Q. So in the prior paragraph, we say -- we indicate that -- that the system logs or -- logs the indication that the image is good or bad.

You see that in the prior paragraph?

A. Yes.

Q. Okay. So if there's a log, it -- it has to make the determination, correct?

JAFFE EX. 2012, Page 111 of 207
Adobe v. Jaffe, IPR2024-01352

A. Yes.

And let me -- let me read off the last sentence of the previous paragraph. It says, "Figure 7 illustrates another example, operational transaction, and also illustrates the system logging an indication that the image is okay/bad."

Q. So if I understand correctly, the sys- -- the system makes a determination; then it logs that determination as an indication, correct?

A. Let me point you to page 90. I'll start on the end of line 4, "Figure 8, shown below, illustrates that Image Authentication Module 15 determines whether the image is okay or bad and writes an indication of this to the log."

Q. Okay. So if the user is not actively in the log file at the time the indication is written, how would the user know what determination the system had made?

A. I missed the first part of the question. Could you --

Q. If the user is not actively in the log file at the -- at the point in time where the system makes the determination --

A. I'm sorry. What do you mean by "in the log file"? In -- the user --

JAFFE EX. 2012, Page 112 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Well, if it -- okay.

If the user does not have the log file open, how would the user -- at the time that the system makes the determination, how would the user know whether or not the determination was good or bad?

MR. LIAW: Object; asked and answered.

THE WITNESS: The log file is already an indication of if the image is bad or -- okay or bad, as I cited earlier on both sentences. Maybe I'll just read this again, right? So --

BY MR. ATKINSON:

Q. Well, no, no. That's okay. I don't --

A. Yeah.

Q. -- I don't think we need to read. What I'm trying to do is understand.

So the -- the -- what the system does when it makes a determination is it writes -- it writes that determination to the log file; is that right?

A. Well, it says on my -- again, I'll just read my report, "writes an indication of this to the log file," but then the last paragraph -- paragraph 204, it says, "The system logging in an indication..."

So it's the indication that is more important. Writing is just for the -- you know, for the record. But the okay or bad is already an indication

whether the image is -- you know, is good or, you know, not good.

Q. Is -- when does the user find out what the indication was?

A. That's -- that's irrelevant. Whether the fact that the image is good or bad has nothing -- I mean, it's irrelevant, right? Whether you know or know -- or I know if the image is bad is a fact. It won't change whether --

Q. When does -- when does the user determine that fact?

A. The user does not determine; the system determines.

Q. When does the user learn the system's determination?

A. Well, that -- that depends. I mean, there's different ways.

Q. Well, what -- what are the different ways that the -- that the user will learn the system's determination?

A. Well, I mean, it's -- suppose I'm using a handheld camera, and then when they -- when I am present, when the log file or the indication or good and bad is written was indicated, then I know at the same time. That's one way.

JAFFE EX. 2012, Page 114 of 207
Adobe v. Jaffe, IPR2024-01352

Or, as you mentioned, one -- another way is, you know, this log is for recordkeeping, and a user can always go back, okay, to recheck the log. So there are different, you know, timing issues. So that's what, I guess, what you're asking.

Q. Well, I -- I -- we may be talking past each other.

Other than when the user is viewing the log file, how would the user know what the determination is?

A. Again, can you repeat the first part?

Q. Other than actively viewing the log file, how would the user receive any communication about what the system's determination is?

A. That's, again, a hypothetical. It's not sort of a -- exhaustive whenever -- you know, the scenarios that I have considered or analyzed in my -- my declaration.

Q. There isn't any, like, on-screen prompt or other active indication of the user, other than -- undertaken by the system, other than writing this determination of the log file, is there?

A. I think, Counsel, your question has two parts. The first about -- can you repeat? Yeah, I think you're asking too much --

Q. Are there any active indications to the user

JAFFE EX. 2012, Page 115 of 207
Adobe v. Jaffe, IPR2024-01352

from the system, other than the writing of the determination of the log file?

A. Yeah. Writing and -- and, you know, good and bad into the log file is just one indication of the image, whether it's authenticate- -- authenticated.

Q. That's my question: Are there any others, other than that?

A. That's not the -- the focus of my analysis.

Q. Okay.

A. As long as -- yeah, writing it as an indication, that suffices for my analysis.

Q. All right. Would you mind turning -- well -- would you mind turning to the paragraph 228? This is relating to the --

A. I'm sorry. You said -- I'm sorry. You said 228?

Q. 228 of your report --

A. Okay.

Q. -- on page 101. Well, it starts at page 100 and continues onto page 101.

A. Yes -- yes, I'm -- I'm on it.

Q. I believe here you're quoting Rieger, and -- and you're pointing to a sentence that says, "In order to protect image data against manipulation from the moment they are received in the CCD sensor to generation

JAFFE EX. 2012, Page 116 of 207
Adobe v. Jaffe, IPR2024-01352

of the signature, some of the system components, including the CCD sensor, the camera CPU (which also contains a signature chip with the secret key), the RAM, the internal clock, a back-up power, and the required connector cables must be integrated into a specially protected compartment in the computer" -- "in the camera housing."

Do you see that?

A. Yes, that's in my paragraph 228, as you just pointed to of my -- my declaration, yes.

Q. Okay. So here we're explicitly talking about connector cables within this device; is that correct?

A. Can you repeat the question?

Q. Here, the -- I'm -- I'm sorry. My computer had something pop up.

Here, you see the language "required connector cables"?

A. I see that. You -- you pointed me to it, yes.

Q. These -- it's specifically referring to required connector cables that are within the -- the camera device described -- the digital camera device described in Rieger; is that correct?

A. I'm sorry. Can you repeat the question?

Q. The required connector cables are integrated into the digital camera described in Rieger, correct?

A. Here, the required connection cable is after a back-up power supply.

Q. Well, there's a long list of things; is -- isn't that right?

A. Yes, there's -- there's -- yeah. You -- you went through all the, you know, items, right: CCDs and CPUs and RAM, the internal clock, and then back-up power supply.

Q. Right. So --

A. Then it has the required connector cable.

Q. Okay. So one -- we can agree that one item in the list is the required connector cables, correct?

A. It is in the -- yeah, in the sentence you quoted, yes.

Q. Right.

And everything in that list, including connector cables, is inside the housing, correct?

A. It says all these items you -- you mentioned in this sentence, right, must be integrated into a specially protected compartment in the camera housing, if that's -- actually, there's a -- kind of a camera-shaped dotted line, right? That's -- that's -- what's -- what you referred to, yes?

Q. Yeah, I think that -- I think so, yes.

Okay. And then you say that the arrows in

JAFFE EX. 2012, Page 118 of 207
Adobe v. Jaffe, IPR2024-01352

Figure 3 illustrate a data path from the sensor -- that's the -- I think that's illustrated on the left of Figure 3 -- and to memory, which I assume is the RAM -- yeah, it's labeled "memory" -- which pointed to RAM on the right side of Figure.

Do I have that right?

A. I -- of course, I'm looking at black and white. I think the electronic copy has an additional annotation with sensor.

Do you see the left-hand side, the sensor on top of the gentleman's head, sensor --

Q. Right.

A. -- pointing to the CCD sensor?

Then on the right-hand side, I have memory pointing to the RAM.

Q. And then you say that the components are electrically connected by conductive leads or traces?

A. That's in that -- yeah, the latter part of paragraph 228, that's correct.

Q. Where does Rieger talk about either electrically connected or conductive leads or traces?

And if you need Rieger, it is Exhibit 1006.

A. Okay. (Witness examines document.)

Also, would you mind repeating the question?

(Exhibit 1006 was marked for identification.)

MR. ATKINSON: Can the court reporter read the question?

(Requested material was read back.)

THE WITNESS: I see. Thank you. Thank you, Kari.

So as I mention toward the latter part of paragraph 228, "The arrows in Figure 3 of Rieger illustrates the data path from the sensor to memory indicates the components are electrically connected by conductive leads or traces within this protected section of Rieger's manipulation-proof camera."

BY MR. ATKINSON:

Q. Okay. Yeah. So -- so if I understand that right, that -- you're not quoting Rieger there; you're providing your conclusion; is that right?

A. My -- my reasons are given in the latter couple paragraphs.

The -- if I cite paragraph 229, it starts with, "My opinion that Rieger discloses utilizing a sensor, which is tightly coupled to said memory..." -- through -- this is through, you know, conductive leads or traces -- "is further supported by the prosecution history."

JAFFE EX. 2012, Page 120 of 207
Adobe v. Jaffe, IPR2024-01352

And then you can go on and maybe just --

Q. Well, there's nothing from Rieger within this paragraph, is there; this is just talking about the prosecution history?

A. Well, if you go on to paragraph 230, right below Figure 2A, I said, "Rieger discloses the same arrangement with the same characteristics," and then I further said, "Figure 3 in Rieger shows a protected section in the camera that includes a sensor (CCD sensor) that is connected through a processor to said memory (RAM) in the same arrangement as in Figure 2A of the '828 Patent."

So the scenario between this figure of the patent and Figure 3 in Rieger further shows that Rieger discloses a sensor that is tightly coupled to a memory.

Q. Right.

So we have the same components, but where does Rieger describe that the connection between those components is by conductive leads or traces?

A. Counsel, this is very similar to the Glass situation that we talked about before the break.

Again, I can repeat my answer. You would have a camera, presumably handheld, the CCD sensor or the lens and the memory all within this small camera. The only viable way to make the connect between the

JAFFE EX. 2012, Page 121 of 207
Adobe v. Jaffe, IPR2024-01352

sensor and RAM is through this conductive lead or trace. It's the same reasoning as I gave in Glass earlier.

Q. Why couldn't the connection be made from one of the required connector cables?

A. Again, I answered your question earlier on. Even -- earlier on, I even said the cable could be one inch short, and then I asked you: How thick is the cable?

So in this case, the simplest -- the only solution is just use either -- I mean, on the circuit boards, use the conductive trace or the -- the lead wire.

Q. But we do know that there are connector cables within Rieger, correct?

A. We -- we just talked about it. Actually, you already talked about the required connector cables, right, must be integrated. Then I said that's just right after the back-up power supply. So the POSITA will know, you know, the power supply issue here is connected to components through the cable.

So a POSITA will understand that these required connector cables will be mostly talk- -- will be talking about the -- the connection to the back-up power supply.

Q. But this is just a list of things, correct?

JAFFE EX. 2012, Page 122 of 207
Adobe v. Jaffe, IPR2024-01352

Like, the back-up power supply falls clock -- there's no connect- -- there's no direct connection between the clock and the back-up power supply, is there?

A. Can you repeat the last part? You said about a clock and the power supply. Can you repeat that part?

Q. So there's this list of things that are within the housing in Rieger that you -- that you recite in paragraph 228, but there's no -- there's no, necessarily -- there's no necessary connection from devices from the order that the list is presented by -- like, for example, there's no necessary -- there's no necessary connection between the internal clock and the back-up power supply, even though that they're sequentially listed together in this list, is there?

MR. LIAW: Objection; misstates the evidence; misstates the record.

THE WITNESS: Yeah. Again, this is a hypothetical scenario. A POSITA would know that most power- -- I would say, intensive component would be the CPU because that's where most of the -- the competition is done.

So the POSITA will know, for example, the -- the power supply -- or the back-up power supply, you know, has to be connected to the CPU, and he or she will -- will know most likely -- or, again, for sure -- that

would be connected to this required connection cable between the back-up power and the CPU.

BY MR. ATKINSON:

Q. So why can no other components, besides the back-up power supply, be connected by connector cables?

A. I'm sorry. Can you repeat the question?

Q. Why can no other components, other than the back-up power supply, be connected by connector cables?

A. When you say "other components," do you mean the -- the sensor --

Q. Other components in the -- that are listed in the housing.

A. Again, this has to do with the -- the current. This is electric engineering. So I mean, the cable, because it's usually thicker than a single wire, it can tolerate higher current. Otherwise, the cable might be burned, you know, to cause a short-circuit.

So that's why, you know, the POSITA will know the connection between the back-up power and the CPU is through a thicker cable. However, the connection between the sensor and the -- the memory, it is not a computing element; it's just a data path, and a POSITA will know that, you know, it has to be just a single trace on the circuit board or, you know, a -- a lead wire.

JAFFE EX. 2012, Page 124 of 207
Adobe v. Jaffe, IPR2024-01352

Q. What connections are illustrated in the figure, other than the connections between -- what -- I'm sorry. Strike that.

What internal connections are illustrated in the figure, other than the connections between the sensor, CPU, RAM, and clock?

A. Well, again, I'm -- I'm looking at this black-and-white copy. There's two black boxes around the -- the -- the picture, I guess, the removable memory part -- see, there's two arrows kind of going, you know, 45 degrees, and that's -- a POSITA will look at it, and that's another -- the other two connections that you didn't mention.

Q. Yeah. Those are external to the housing, correct?

A. That's -- that's correct. I mean, other back-up power, for example. That's internally inside the housing, and that image showed the back-up power unit. But the POSITA will know, and that's why the required power cable concept to the CPU.

Q. In paragraph 232, you say, "Figure 3 shows the CCD sensor, processor, and RAM" -- "shows the CCD sensor, processor, and RAM connected to each other with required connector cables."

You see that?

A. Yes.

Q. This is on page 103.

A. Yeah, I see that.

Q. Isn't it your understanding that these components are -- are connected with connector cables?

A. Again, we're going back to the -- to Figure 3 in the previous page. As I mentioned, the POSITA will know the required connection cables will be used to connect the back-up power to the CPU.

Q. Where is the back-up power and the CPU identified in the sentence that I just read from paragraph 232?

A. I -- I -- I didn't include it, but from the -- from that paragraph 228, this is clear.

Q. You said that -- that these components are connected to each other with the required connector cables, though; isn't that correct?

A. Yeah. So this is quoted, "Retire" -- this is a quote one, "Required connection cables."

Here -- if you read the next sentence, here, when I say this quoted "required connection" -- "connector cables," I say that, "A POSITA would understand that these connections would be made using conductive traces and" -- "and leads, including to transmit information between those components."

So I'm talking about using this, quote/unquote, required connection cables. These are just -- here is different, right? I mean, this connection is between these on- -- only these three components. So this quoted "required connection cable" would be different from the earlier ones in paragraph 228 that I mentioned earlier that connects between the power supply and the CPU.

Q. So are you saying that the required connector cables are -- that the connections using the required connector cables are connections made using conductive traces or leads?

A. Again, let me make it clear -- all right -- in paragraph 228, right, that's quoted from the whole sentence I already quoted. Rieger explains -- that's the sentence you read earlier, and that's from Rieger.

The POSITA reading this sentence will know, even know the back-up power is not shown in Figure 3 of Rieger, he or she knows that the -- there will be a thicker connection cable connecting the back-up power supplied to the CPU because that's the most heavy current flow between these two.

And then when I described the quoted "required connection cables" in paragraph 233, now I was talking about using the terminology of Rieger, but now

I'm more specific about the connection between these three components; namely, the CCD sensor, the processor, and the RAM.

And the purpose this is for, as I mentioned, if you look at the end of my paragraph 232, it is for transmitting information between those components. A POSITA will understand that these connections are made by conductive traces or leads.

Q. So when you say that the CCD sensor, processor, and RAM are connected to each other with required connector cables, you mean that they are not connected to each other with required connector cables?

A. No. I mean, your sentence is self-contradictory. You said with required connection cables and then not required cables. I don't understand your question.

Q. I don't understand either, because you seem to be saying that connector cables are not conductive traces or leads; is that right? Or do I have that wrong?

A. That's not what I -- let me repeat here. Again, there are two places, right? You recall in paragraph 228 I quote from Rieger. Look in that sentence you cited earlier. A POSITA would know that these required connection cables in Rieger will be the

connection between the back-up supply and the CPU.

Q. But you weren't talking about the back-up power supply in the CPU in the sentence in -- in the second sentence of paragraph 232, are you?

A. No. Here, in paragraph 232, it is very specific. I said, you know, there's a connection, right, in Figure 3 between the CCD sensor and -- and the processor; there's also a connection between the processor and the RAM. "Connect with each other," here I use a quote. It required a connector cable because that's the kind of language he uses in -- in Rieger, so I quoted it.

But here, the POSITA will know, as I mentioned, because these connections are for information transmission, and they will be using conductive traces or leads.

Q. So cables used for information transmission, those are conductive traces or leads?

A. Again, you have to put the context in the sentence. Here, this sentence in paragraph 232, the sentence I -- I have is, "Figure 3 shows the CCD sensor produced" -- "processor, and RAM connected to each other with 'required connector cables.'"

And then, you will look at the second sentence, that the POSITA would understand that these

connections are -- or required connection -- connector cables would be made using conductive traces or leads.

Q. Okay. So these connections using connector cables are made using conductive traces or leads?

A. For the connection between these three components: CCD sensor, processor, and RAM.

Q. Okay. And so why are -- the connections between these components using connector cables, why are those by conductive traces or leads?

A. I already explained because they are for information transmission, so the power consumption is relatively low versus the connection between the back-up power supply and the CPU. Earlier I mentioned CPU is the most power, you know, intensive unit, and it is high current, not only between the back-up power supply and the CPU, and that's -- in general, we can call this required cable connection. It could be a -- usually, it's a thicker cable because of the current -- high current. It requires a thicker cable; otherwise, it will burn the -- you know, the connection.

Q. Okay. So because the connector cable is -- is performing information transmission, that's what makes it a connective trace or lead?

A. That's part of it, because here you're looking at the information offload from the sensor to the CPU,

JAFFE EX. 2012, Page 130 of 207
Adobe v. Jaffe, IPR2024-01352

as in no low energy consumption operation. Likewise, the information transmission between the CPU to the RAM is also a lower power consumption operation. For these connections, that's why I say they are made using conductive traces or leads.

Q. Okay. In paragraph 233, you talk about this specially protected compartment in the camera housing.

Do you see that?

A. First long sentence, the end of it, yes.

Q. And it talks about how that secure compartment is protected by an electrical protective shield?

A. Yes. That's the next sentence.

Q. And then you talk about how -- when the shield is drilled or severed, that there's a change of potential that causes the secret key to be deleted; is that right?

A. I -- I'm sorry. The last part you went through very quickly.

Q. I was trying to condense the --

A. Okay.

Q. What happens whenever there's -- whenever there's a drilling or -- whenever the protective shield is drilled or severed, there's a change in potential, and that change in potential causes the secret key signature chip to be deleted, right?

A. That's one -- one of the consequences, yes. That's what I said.

Q. Okay. This electric shield is -- it's -- it's basically monitoring the -- the housing that these components are contained in; is that correct?

A. If I can point to -- point you to paragraph 243, I said, "Rieger discloses monitoring the integrity" -- are you there?

Q. Yeah, I see it. I'm here.

A. -- "Rieger discloses monitoring the integrity of the tight coupling between said memory and said sensor ('which again means determining whether physical access has been gained to the coupling between said memory and said sensor') as discussed above."

Then I say that "Rieger states that the secure compartment can be protected, for example, by an electrical protective shield. When the secure compartment is drilled or severed, a change in potential is triggered and detected by the processor, which then automatically deletes the secret key stored in the signature chip."

And then -- this is a key part -- according to Rieger, I said this mechanism "ensures that data" -- "image data cannot be altered without detection prior to application of the signature."

JAFFE EX. 2012, Page 132 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Okay.

A. So by determining whether the secure component has been drilled or severed, the Rieger system determines whether physical access has been gained to the coupling.

Q. Okay. So what's being monitored is the housing of the secure -- what's being actually monitored is the housing of the secure compartment, correct?

MR. LIAW: Objection; misstates prior testimony.

THE WITNESS: So let me point you to the next paragraph, 244. Yeah. So I will skip the first part.

It says, "The system is always monitoring the secure compartment to determine whether physical access has been gained to the connection between memory and sensor, including when camera parameters are generated."

Then I said, "Indeed, Rieger states that the camera 'provides physical protection of the image during each stage of the image-production process, from origin in the image sensor to generation of the photographer’s signature.'"

So -- so this monitoring is, again, let me emphasize, right, during each stage of the imaging

production process, from origin in the image sensor to generation.

So any intermediate stage, including the connection between the sensor and the memory, if that is disconnected, that's also part of the monitoring here.

Q. Let me -- let me just see if I understand.

So what's being -- what's being actually monitored by the electric shield is the -- is the housing; is that right?

MR. LIAW: Objection; asked and answered.

THE WITNESS: I already said that the monitoring provides physical protection during each stage of the -- the image-production process. So it's at every stage.

BY MR. ATKINSON:

Q. So that -- that's -- the -- that's answering the question of "when" and not "what."

Like, what -- like, I'm not -- I'm not -- I'm not interested in -- in when it's being monitored. I'm -- I'm interested in what is being monitored.

A. Yeah, I answer both your -- your -- your pints in this sentence, again, that's in paragraph 244. Let me read the sentence first, then I'll explain.

"Indeed, Rieger states that the camera 'provides physical protection of the image during each

JAFFE EX. 2012, Page 134 of 207
Adobe v. Jaffe, IPR2024-01352

stage of the image-production process, from origin in the image sensor to generation of the photographer’s signature' (i.e., all" -- "at all times)."

So in terms of when, it's all the time. In terms of what, it's every stage, each stage of the image-production process.

Q. So what is the electric shield monitoring?

MR. LIAW: Objection; asked and answered.

THE WITNESS: I'll -- I'll just, yeah, give the same answer, right? Each stage of the --

BY MR. ATKINSON:

Q. Well -- okay. Let's not -- let's not do that.

What -- so -- so the purpose of the -- of the electric shield is to determine whether the compartment has been drilled or severed.

Does that -- can we agree on that?

A. Again, if we look at paragraph 244, the monitoring --

Q. So I'm -- I'm looking at paragraph 243, though.

All right. If you look at the second line, you says -- or the first and second line says that the compartment is protected by electric shield, and then the next sentence, you say, "When the secure compartment is drilled or severed..."

So the -- if I understand this correctly,

JAFFE EX. 2012, Page 135 of 207
Adobe v. Jaffe, IPR2024-01352

the purpose of the electric shield is to determine when the secure compartment is drilled or severed; is that right?

A. No. As I mentioned in paragraph 244, Rieger states that the camera provides physical protection or monitoring of the image during each stage of the image-production process. So the monitoring is at all times, and what's monitored is every stage of the production process, from origin in the image sensor to generation of the photographer's signature. So it's very, very clear.

I answered your question many times.

Q. What causes the -- the -- the determination that there's been a violation of the protective shield?

A. Violation of the protective shield is just one instances of the monitoring.

Here, you have ask -- I answered those questions, right?

So if the compartment is drilled and severed, in paragraph 243, then a change will be, you know, detected, and -- and -- and there will be consequences in terms of deleting the secret key and all that.

Then when you ask the question of when, you know, the protective compartments is monitored and what

JAFFE EX. 2012, Page 136 of 207
Adobe v. Jaffe, IPR2024-01352

are monitored, I answered you both questions. In terms of "when" is all the time. In terms of "what" are monitored is every stage of the production process.

Q. You would agree that if you drill or sever the -- the housing, that that causes the protective shield to basically trigger, correct?

A. That's one instances of triggering, the -- the -- triggering deletion of the secret key.

Q. That's the instance that's described in -- in Rieger, correct?

A. That's one -- one -- yeah, one -- one instances.

Q. What other instance is -- let's go to Rieger, specifically.

Where -- what other instances does it describe the -- the electric shield being triggered, besides that?

A. Again, Counsel, if -- if you give me time later, I can, yeah, review the whole thing and --

Q. Yeah, yeah, take a look at Rieger.

And I think -- I think the specific portion where it's talking about the shield is -- is on page 4 of Rieger.

THE COURT REPORTER: Is there a chance we can take a restroom break, or am I --

MR. ATKINSON: Yeah. Yeah, let's -- it's about time for a break.

BY MR. ATKINSON:

Q. So, Dr. Xiong, I'll represent to you that the only reference I find to -- to protective shield is on page 265/page 4 of Exhibit 6?

Have you found any -- any reference to the protective shield being triggered, other than by this drilled or severed instance?

A. Again, I'm going to give you the same answer. This is just one instance.

And I haven't gotten enough time to review the whole Rieger reference, but again, if I point to the sentence in paragraph 244 of my declaration, Rieger states that the camera provides physical protection of the image to each stage of image-production process. For example, if the connection between the sensor and the memory is -- is broken and this is part of the protection process, that is -- the next part of the sentence says, "From origin in the image sensor..."

That's exactly what -- what I'm talking about. Any connection in the pipeline, if it's broken, then this will be detected.

So there's plenty of examples that the POSITA can think of from this sentence.

Q. All right.

MR. ATKINSON: Let's -- let's take maybe a ten-minute break. Is that -- is that okay?

MR. LIAW: Yeah, that sounds fine.

THE VIDEOGRAPHER: We're going off the record at 4:55.

(Brief recess taken.)

THE VIDEOGRAPHER: We're back on the record at 5:09.

BY MR. ATKINSON:

Q. All right. Dr. Xiong, would you mind turning to paragraph 257 of your report, which is on page 116?

A. You said 116, right?

Q. Yeah, page 116, paragraph 257.

A. Yes.

Q. Okay. You'll see about halfway through the -- the paragraph, you talked about the frowning face image that's in Figure 7, which, I think, is, like, reproduced on -- well, reproduced in an annotated form on the top of page 116.

A. I see that.

Q. Okay. And you -- you say that "the frowning face image indicates to a per-" -- "to a POSITA that if said first and second images are not the same, Rieger's integrity test generates an error signal"?

A. Like a funny face in parenthesis, yes, I see that.

Q. Yeah. So I see the -- the -- the frowning face in -- in Figure 7, but where does Rieger state that the frowning face is presented to the -- to the user?

And the -- the image is on -- if you need to look at actual Rieger, the -- Figure 7 is on page 12/page 273, depending on which page number you're looking at.

A. So, then, I can repeat the -- the sentence you just cited. Towards the -- probably the second half of paragraph 257, I said --

Q. No. So I'm not looking -- I'm not asking you about the declaration; I'm asking: Where in Rieger it says that the -- that the frowning face is displayed to the user?

A. The fact that it is a frowning face and a smiling face in Figure 7 -- that's what I said -- to a POSITA that if the set -- first and second signatures are not the same, Rieger's integrity test generate an error signal. The error signal is what Rieger mentions, you know, and in his -- in Rieger, let me find the error signal here.

(Witness examines document.)

So in Rieger 54, Figure 7, at paragraph --

JAFFE EX. 2012, Page 140 of 207
Adobe v. Jaffe, IPR2024-01352

the second -- the last part of the paragraph, it says, "In this way, every user can check..."

See, this is it can check. "Check" means the frowning or -- or the smiling face to determine whether a given hash result can actually be assigned to a specific message.

Q. So it says that the user can check -- can check, but where does it say that either the smiling face or the frowning face are displayed to the user?

A. A POSITA will -- that's what I said. The -- the POSITA, by looking at the -- the face, whether it's a frowning face or -- or smiling face, will know whether the first and the second signature are the same or not. If they are the same, it's a smiling face; if they are not, it's a frowning face.

So what I have in my declaration and this sentence -- last sentence, again, about Figure 7 of Rieger are very consistent. "Check it" means just look at the faces, frowning or smiling. Frowning means signatures are not the same; smiling face means the signatures are the same.

Q. Is there any description in the text of Rieger referring to either the smiling face or the frowning face?

A. I look at -- a POSITA looking at Figure 7,

right underneath the sentence.

Q. No, I'm not talking about Figure 7; I'm talking about the text of Rieger.

Is there any reference to either the frowning face or the smiling face?

A. As I mentioned, the last sentence above Figure 7, "Every user can check."

The POSITA reading this sentence, while looking at the Figure right underneath it, there are smiling faces and then frowning faces, and that's -- a POSITA will be reading, and that's how he or she checked to determine whether a given hash result can actually be assigned for this message.

Q. So these aren't displayed until the user performs a check?

A. That's one way, and similar to the Glass case in terms of the log, the system of Rieger would always display the frowning or the smiling face, but no matter whether -- regardless of whether the user checks or not or looks at it or not.

Q. But images themselves are not referred to in the text?

A. The hash is the hash diversion.

Q. I'm sorry. The -- the -- the smiling/frowning face images are not explicitly referred to in the text

of Rieger, correct?

MR. LIAW: Objection; asked and answered.

THE WITNESS: As I mentioned, when the POSITA read this sentence, right, this way every user can check, he or she immediately will know from the Figure 7 that means check the face, whether it's a frowning face or a smiling face.

BY MR. ATKINSON:

Q. So your interpretation is that the word "check" refers to these face -- emoticon-looking things?

A. To me, this is at least the most straightforward way to check, to look at the faces.

Q. What about the other portions of Figure 7? Are -- any of those other figures displayed to the user? Like, for example, is the telephone lines displayed to the user?

A. I'm sorry. If the telephone -- I didn't get the last part. Telephone lines what?

Q. You see the telephone lines in the --

A. Yeah. In the middle, I see that, yes.

Q. Are those displayed to the user?

A. What do you mean? What do you mean this is?

Q. Those -- that telephone lines in the chart, are those -- are those displayed to the user at any point?

A. Those are just illustrations, for example, of

the transmission channel for the images. So it's just illustration. This is not --

Q. What about the key images? Would those be displayed to the user?

A. Keys are not for display.

Q. Okay. So in your interpretation, the only -- the only portion of Figure 7 that would be displayed to the user are these smiley faces and the frowny face?

MR. LIAW: Objection; misstates prior testimony.

THE WITNESS: Again, I'm saying the most obvious indication of the checking process will be looking at the faces. For example, the user will only -- will also look at the images. The images most likely be for viewing purposes.

BY MR. ATKINSON:

Q. When you say "images," are you talking about the images that are being authenticated or the -- or the frowning face/smiling face images?

A. I'm talking about the image on the top left and top right. Those are also for viewing purposes.

Q. So the user is seeing the images and not the -- and not the smiling face and the frowning face?

A. User looks --

MR. LIAW: Objection, vague.

JAFFE EX. 2012, Page 144 of 207
Adobe v. Jaffe, IPR2024-01352

THE WITNESS: Even though the two images on the figure looks -- I'm saying, you know -- subjective, or visually, then the user really needs to check the face. If it's frowned, funny face, that means that this image is not -- probably not authenticated. In other words, these two images, again on the top left/top right, they are not the same, or at least are not authenticated. If there's a smiling face, and then the user will say: Okay, this image is the real authenticated version of the original.

BY MR. ATKINSON:

Q. I can't quite tell what's happening. It looks like there's some kind of hand-crank thing under the -- under the sender and receiver images.

The hand-crank image, that also wouldn't displayed to the user; is that right?

A. Which one -- can you -- I --

Q. Like, underneath the little -- the face, which I assume is, like, the image that's being authenticated in Figure 7, I can't tell what that is, but it looks like it may be kind of a hand-crank thing.

Do you see that?

A. Yeah. That's just an illustration, I think, that -- you know, the use- -- the authors use to illustrate. I believe it's a hashing process.

JAFFE EX. 2012, Page 145 of 207
Adobe v. Jaffe, IPR2024-01352

Q. Right.

That -- that wouldn't be displayed to the user either, is that right, the little -- the hand-cranked depiction?

A. That's just the illustration of the hashing process as more of a pictorial, kind of, you know, illustration.

Q. Okay. So there are pictorial illustrations in Figure 7 that aren't displayed to the user; is that right?

A. Again, this is not the focus of my analysis. I would, again, go back to my -- my declaration. Again, I'll read the sentence, and it can answer your question: "The frowning face image indicates that" -- "to a POSITA that the two signatures are not the same."

And you asked me to go back to Rieger. We're talking about the frowning and smiling faces. In terms of the little, I guess, caricature under the two images, this is not the focus of my -- my analysis. So I wouldn't -- I wouldn't offer more opinion on this.

Q. Okay. Would you turn to paragraph 274 of your -- of your declaration? It's on page 124.

A. Yes, I'm looking at it.

Q. So for Claim 1, this is in relation to the Exif 2.0 and 2.1 standard documents, which, you know, if you

need to refer to them, they are exhibits -- hold on; sorry -- Exhibits 1008 and 1009.

A. Yes.

Q. The only -- the only element that you're -- that you're -- for Claim 1 that you're referring to these documents -- or these standard documents for is for the -- the -- at least one internal and unique parameter element.

Is that -- do I have that correct?

MR. LIAW: Objection, vague.

THE WITNESS: So if you look at the last sentence of paragraph 274, I said the combination of Glass or Rieger with these two references, Exif 2.0 and 2.1, disclose all limitations.

BY MR. ATKINSON:

Q. Right.

So I just wanted to -- I think I understand, but I want to make sure that -- that I do.

So what you're saying is that for all the other elements of Claim 1, you're referring back to your Rieger analysis, correct?

A. Here, I'm in combination with -- the earlier analysis --

Q. The -- okay. Just -- just -- I want to -- so we have all the -- all the analysis we have before with

JAFFE EX. 2012, Page 147 of 207
Adobe v. Jaffe, IPR2024-01352

Rieger. What you're adding to the Rieger analysis with the Exif 2.0 and 2.1 only relates to the -- at least one internal and unique parameter element, correct?

MR. LIAW: Objection, vague.

THE WITNESS: Yeah. Again, the -- your question was modified a bit. Can you repeat that?

BY MR. ATKINSON:

Q. Okay. Let me -- let me ask it this way: Other than at least one internal and unique parameter limitation, what elements in Claim 1 are you relying upon Exif 2.0 or Exif 2.1 for?

A. Again, as I just mentioned, the combination of Glass or Rieger with these two Exif standards disclose all limitations of Claim 1, including the parameter limitations.

Q. Okay. What limitations, other than the parameter limitations, does the Exif 2.0 and 2.1 standard documents disclose?

A. I'm sorry. Can you repeat the question?

Q. What limitations, other than the parameter limitations, does -- does the Exif 2.0 and 2.1 documents disclose?

A. Are you talking about in the Claim 1 limitations?

Q. In Claim 1, yes.

A. And this sentence is very clear this is all limitations, including, all limitations, and we see there's -- if you go to page 4 of my report, and we have all these different claim elements of Claim 1, from 1A to 1I. So that's what I meant. So it's to disclose all limitations.

Q. But those limitations -- the analysis for those limitations are coming from -- from -- from Glass or Rieger?

A. That's a separate story. Here, I'm talking about the combination of Glass.

So early on your part of the question is -- and we already addressed that in the earlier part of my declaration -- both Rieger and Glass alone discloses all the limitations of the --

Q. Right. Right.

A. Now --

Q. I'm just trying to find out what you're trying to add to Claim 1 with -- with Exif 2.0 and 2.1. I thought you were only trying to add additional support for the parameter limitations, but it sounds like you may be trying to add support for other things.

A. I -- I stand by -- with what I said here.

Here, I'm talking about the combination of Glass or Rieger with these -- one of these two standards

JAFFE EX. 2012, Page 149 of 207
Adobe v. Jaffe, IPR2024-01352

of Exif disclosed all limitations.

Q. But Exif you're relying upon for the parameter limitations?

A. You see, then, we have to go back to paragraph 16- -- let's see -- 272.

Q. Well, let -- let me put it this way: You don't provide any -- any analysis of Exif 2.0 or 2.1 for any other limitations in Claim 1 in paragraph 274, do you?

A. It is what it is.

Q. Okay.

A. I would, again, repeat the last sentence. So my conclusion is that --

Q. Yeah, that's okay. I think we can read it.

A. Okay.

Q. All right. Would you mind turning to the Serret-Avila document? And if you need to refer to your -- your -- your declaration -- your analysis of Serret-Avila, it starts on page 129, paragraph 285. Serret-Avila is EX 1011.

A. I have it, 1011.

Q. Serret-Avila is not directly -- does not mention or describe camera or image -- image files directly, does it?

A. I disagree with that. That's incorrect.

Q. Okay. Where -- where does Serret-Avila

describe either digital cameras or image files?

A. Now, there are quite a few places. For now I'll just point to you one place in Serret-Avila, column 2. We can start from line 44, "Thus, for example, multimedia files..."

First of all multimedia could be audio, video, images, text, graphics. So --

Q. Well, it -- it specifically says comprised of multiple MPEG frames, and MPEG is video; isn't -- isn't that right?

A. I was going to read that to you. So as I mentioned, first I explained multimedia files could be image files.

"...comprised of multiple MPEG frames are typically designed to be processed on-the-fly by the consumer's device, each MPEG frame" -- see, this is -- each MPEG -- MPEG, you are right, is a video, but each MPEG frame in here is a image being processed. So this is another indication when we talk about images.

And there are other places that I -- yeah, I can find it, you know, if you give me enough time. But for now, I'll stop.

So I mentioned multimedia files could be image files, right? And then here, each -- MPEG frame means image specifically being processed while the next

process is also the image is received.

Q. Well, the frames are not stored a separate -- as separate files, though, are they?

A. Well, images will be separate. So the multimedia --

Q. Image files would be separate, but the MPEG frames are not stored as separate files, correct?

A. I mean, there are cases of video that may only has one frame that's a file -- that's a video file, as well. For example, if you put a video in just single static frame, and that's -- even a video is just one frame. So this a video that plays more than, you know, one frame, just continue to play the same frames also, a video, but it's only one frame.

Q. There's no reference to any, like -- any -- any image files, such as JPEG, or TIF or other image formats in Serret-Avila, is there?

A. Yes. And let's -- again, let's just explore this. Each MPEG frame can be processed while the next frame is received. So when we talk about the first frame of MPEG, it's a JPEG-compressed image. So for the first frame, it uses a JPEG.

Q. Serret-Avila doesn't talk about JPEG files, though, specifically, does it?

A. A POSITA will know when it mentions each MPEG

JAFFE EX. 2012, Page 152 of 207
Adobe v. Jaffe, IPR2024-01352

frame. Actually, there is a mode of MPEG that's called motion MPEG. This -- you know, I'll spend maybe one more extra minute to explain. In digital --

Q. Well, is -- is motion MPEG or --

MR. ATKINSON: Please don't interrupt the witness when he's answering.

BY MR. ATKINSON:

Q. Okay.

A. So in the motion MPEG phase in digital cinema, each frame of the video is encoded in a JPEG format. So you just code individual frames one at a time using JPEG, and that's -- that's played in digital cinema. It's all JPEG.

Q. JPEG isn't specifically mentioned in Serret-Avila, though, is it?

MR. LIAW: Objection; asked -- asked and answered.

THE WITNESS: As I mentioned, a POSITA reading this sentence will know, and digital cinema is quite common in the theatres. So each MPEG frame in this case, in digital theatre, will be a JPEG-compressed image.

BY MR. ATKINSON:

Q. Does the word "JPEG" appear in Serret-Avila?

A. Well, if you look at the word, no, but MPEG,

right -- you see J- -- JPEG/MPEG, right? (Indiscernible). "M" means just motion.

So a POSITA reading this and that think about the example digital cinema will know this can be JPEG as well, motion JPEG.

MR. ATKINSON: Objection, nonresponsive after "no."

BY MR. ATKINSON:

Q. Let me see.

A. And even in the motion --

Q. I don't have a question pending.

A. Can I can finish my answer, Counsel?

Q. You can state it, but I -- I'll -- I'll object as nonresponsive.

A. Even --

MR. LIAW: You can answer if you want.

THE WITNESS: Yeah.

Even in MPEG alone, there is a mode or what we call all I-frame. So you can set when you encode a video such that each frame is coded as I-frame, "I" meaning this intra-frame, is just independently coded as MPEG. So there's a handful of examples of MPEG using JPEG to compress each frame.

MR. ATKINSON: All right. I'll pass the witness.

JAFFE EX. 2012, Page 154 of 207
Adobe v. Jaffe, IPR2024-01352

THE WITNESS: Thank you, Counsel.

MR. LIAW: No, I don't have any questions at this time.

THE VIDEOGRAPHER: Okay, everybody, stand by. We're going off the record at 5:39.

(Deposition concluded at 5:39 p.m.)

JAFFE EX. 2012, Page 155 of 207
Adobe v. Jaffe, IPR2024-01352

CHANGES AND SIGNATURE

ZIXIANG XIONG, PhD

Friday, May 16, 2025

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I, ZIXIANG XIONG, PhD, have read the foregoing deposition and hereby affix my signature that same is true and correct, except for the changes noted above.

_____
ZIXIANG XIONG, PhD

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§
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Before me, _____, on this day personally appeared ZIXIANG XIONG, PhD, known to me (or proved to me under oath or through _____) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this _____ day of _____, _____.

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THE STATE OF _____

My Commission Expires: _____

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JAFFE EX. 2012, Page 157 of 207
Adobe v. Jaffe, IPR2024-01352

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

ADOBE, INC.,	§	
	§	
Petitioner,	§	Inter Partes Review No.
	§	IPR2024-01352
VS.	§	
	§	
	§	
JONATHAN E. JAFFE,	§	U.S. Patent No. 6,757,828
	§	
Patent Owner.	§	
	§	

REPORTER'S CERTIFICATION
ORAL & VIDEOTAPED DEPOSITION OF
ZIXIANG XIONG, PhD
FRIDAY, MAY 16, 2025

I, Kari J. Behan, CCR, CSR, and in and for the State of Texas, do hereby certify that the facts as stated by me in the caption hereto are true;

That there came before me the aforementioned named person, who was by me duly sworn to testify the truth concerning the matters in controversy in this cause;

And that the examination was reduced to writing by computer transcription under my supervision; that the deposition is a true record of the testimony given by the witness.

I further certify that I am neither attorney or counsel for, nor related to or employed by, any of the parties to the action in which this deposition is taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties hereto, or financially interested in the action.

Given under my hand and seal of office on this 12th day of June, 2025.

Kari J. Behan

KARI BEHAN, CCR, CSR
Texas CSR NO. 8564;
Expiration Date: 7-31-2026
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RE: Adobe Inc v. Jaffe, Jonathan E.
DEPOSITION OF: Zixiang Xiong , PhD (# 7370097)

The above-referenced witness transcript is available for read and sign.

Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those on the attached Errata Sheet.

The witness should sign and notarize the attached Errata pages and return to Veritext at errata-tx@veritext.com.

According to applicable rules or agreements, if the witness fails to do so within the time allotted, a certified copy of the transcript may be used as if signed.

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JAFFE EX. 2012, Page 159 of 207
Adobe v. Jaffe, IPR2024-01352

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& 1:9,13 2:4 4:17,25 85:22 158:9

1

1 10:18 13:2,16 14:8,10 16:6,9 16:11 21:5 28:8 35:21,24 36:2,8,10,14,23 36:25 37:10,14 38:2,4,8 44:8 63:5,16 64:20 65:2,5 146:24 147:5,20 148:10,14,23 148:25 149:4 149:19 150:8 156:1
10 59:19 62:3 156:10
100 42:20 116:19
1001 3:11 35:17,21 55:20 65:4
1002 3:12 18:10,14,25 45:3 46:25
1003 3:13 9:19 9:23 21:10 67:16
1005 3:15 67:19,22 68:6
1006 3:16 119:22 120:1
1008 3:19 147:2
1009 3:20 147:2
101 116:19,20
1011 3:21 150:19,20
103 126:2
10:41 1:16 4:2 4:5
10:50 10:7
11 156:11
116 139:12,13 139:14,20
11:03 10:10
12 59:19 140:8 156:12
120 3:16
124 146:22
127 3:6,7,19,20 3:21
128 56:21 57:16 59:11,15
129 150:18
12:04 44:22
12:34 44:25
12th 158:20
13 156:13
14 39:13 40:5 40:12 156:14
141 27:18,18,23 37:24 67:1
142 27:12,18,23 29:7,8 34:23 35:3,6 37:24 37:25 38:2 39:5 66:23 67:1 78:19
145 60:25 62:5 62:11 63:8
146 59:21 62:4 62:8 63:8
15 112:12 156:15
157 22:17 27:10 66:16,23
16 1:10,16 4:2 38:11 150:5 156:3,16 158:10
16th 4:4
17 156:17
170 67:16,25 68:13
171 70:23 71:9
172 68:3 77:2
173 77:13
18 3:12 156:18
181 95:9 101:7
183 95:23 96:13 99:13,22 102:15
184 97:23 98:19
19 156:19
192 46:24
1:21 67:10
1a 149:4
1i 149:5

2

2 57:6 65:5 68:12,18 70:13 76:9 77:18 79:7 151:4 156:2
2-0 3:19
2-1 3:20
2.0 147:13 148:2,11,17,21 149:19 150:7
2.1 146:25 147:14 148:2 148:11,17,21 150:7
2.1. 149:19
2.o 146:25
20 26:25 94:15 156:20
2000 33:2 57:11 76:10,22 87:1,7,13,21 91:1,5
2025 1:10,16 4:2,4 156:3 158:10,20
204 113:21

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JAFFE EX. 2012, Page 160 of 207
Adobe v. Jaffe, IPR2024-01352

205 108:10,20
20807 158:22
21 94:24 156:21
22 156:22
228 116:13,16 116:17 117:9 119:19 120:9 123:8 126:14 127:7,14 128:23
229 120:20
23 94:16,24 156:23
230 121:5
232 125:21 126:12 128:5 129:4,5,20
233 127:24 131:6
24 156:24
243 132:7 135:19 136:20
244 133:12 134:22 135:17 136:4 138:14
25 33:5,7 34:21 51:16,20 55:22 107:2,8 156:25
2500 2:10
252 36:11,20,22 37:4,17 38:4,8 65:8,8
254 65:7,8
255 65:14,18
256 59:11,15
257 139:12,14 140:12
258 37:6
26 26:21
265 138:6
27 26:25 27:1,4 78:1,2,3
272 150:5
273 140:8
274 146:21 147:12 150:8
277 19:6,12 45:11
283 45:3,5,6,13
285 150:18
292 46:2,22 48:14
293 48:17
2:27 67:13
2a 19:23 22:17 27:4,6,8,13,16 27:17 28:5,13 29:3 34:22 35:2,6,10,15 37:11,14,20 38:20,22 39:4 65:21 66:22 77:20,24 78:3 78:19 79:3 80:3,9 121:6 121:11

3

3 38:11 71:3,4 71:9 72:20 73:20,20 75:1 75:9 77:19 79:11,16,20 80:7,17,19,20 81:13,16,17,25 82:2,25 83:4 83:22 84:24 85:1 88:24 89:1,12 90:4 91:13 93:23 102:17,20,24 119:1,3 120:9 121:8,14 125:21 126:6 127:18 129:7 129:21 156:3
3.5 27:11,19 28:2,5 29:9 34:3,12,23 35:2,6 37:21 39:5 78:19
30 66:3,4 107:2
31 57:5
314 55:6,8
32 58:1,12
336-4000 158:25
34 55:23
35 3:11
36 36:14
3639999 58:5
3:38 106:18
3:52 106:21
3rd 2:10

4

4 36:13 39:9 68:7 69:13 70:5 71:18 81:11 82:18,21 82:22 95:15 101:14 112:11 137:22 138:6 149:3 156:4
40 36:17 88:3
41 72:23
415 2:6
42 73:16 79:15 80:6,17 81:1 85:8,22,25 86:7 91:14
43 10:13 21:16 21:17,22 28:9 73:16 79:16 80:6,17 81:1 85:9 86:1,8 88:5 89:8 91:14
44 22:19 96:6 151:4
45 39:20 86:1 88:5 89:7 125:11

JAFFE EX. 2012, Page 161 of 207
Adobe v. Jaffe, IPR2024-01352

46 72:2,7,9,15
48 72:2,7,9,15
49 81:14,18
4:55 139:6

5

5 3:5 72:2,6,12 72:15 82:18 85:21 88:3 89:5 90:4 94:14,22,23 105:24 107:2 107:18 108:4
5,764,770 45:14
50 89:5,5 95:12
51 36:14 85:21 96:4,5 99:16 99:19,21,25 100:8,15,16,17 100:23 102:9 102:12,22 103:6,9,20,21 103:24 104:1,4 104:5,11,14,21 105:17
512 2:11
52 88:3
53 85:21 89:6 96:5
54 68:10,15,16 88:4 89:5,6 140:25
55 68:9,24 82:22 89:6
57 51:15,17,18 51:22
571 158:24
582-6889 2:11
5:09 139:9
5:39 1:17 155:5 155:6

6

6 39:15 40:7,14 68:1,4,22,25 69:3,5 70:2,9 70:12 138:6 156:6
6,253,337 45:15
6,332,103 3:15
6,757,828 1:6 3:12 9:3 158:6
6,959,384 3:21
60 26:21,23 27:2 69:13
607 2:10
64 57:4,6
65 39:9
66 57:20
67 3:15 39:10

7

7 55:22 60:2,15 112:3 139:18 140:4,7,18,25 141:17,25 142:2,7 143:6 143:13 144:7 145:20 146:9 156:7
7-31-2026 158:23
73 28:15,23 29:5,8 66:15
7370097 1:24 159:4
74 67:16 68:18 71:1
75 71:4 72:6 73:20 81:7,7
76 77:3
77 77:14
78701 2:11
7a 60:6

8

8 9:7 59:19 62:3 68:22 69:9,10,11 70:3,9,13 112:11 156:8
80 95:8
800 158:25
81 95:23 97:10 98:10 99:4
82 48:7 49:10
828 3:14 9:8 14:14,15,18,24 15:16,22 16:9 16:18 18:16 19:1 21:5 23:25 26:9 27:6 28:18,22 29:14,18 30:3 30:7,13,19,25 32:15 33:3,13 33:24 34:4,19 35:2,20,24 36:2 47:20 48:8,23 49:11 49:13,18 55:11 55:19 57:22 59:17 60:4 64:21 65:2,4 77:11,17,21 79:3,17 80:3,9 121:12
8564 158:23

9

9 3:13 156:9
90 112:10
900 2:5
92 48:14
93 10:13 13:2 21:11 26:20
94 10:24 21:13 21:15,19,20,25 26:20
940 36:24
94104 2:5
95 21:13 23:7,9
954-4497 2:6
96 12:3 13:9 21:14 29:19
97 43:18

JAFFE EX. 2012, Page 162 of 207
Adobe v. Jaffe, IPR2024-01352

98 40:1,16
99 41:2

a

a.m. 1:16 4:2
able 54:21 55:1 76:13 108:8
above 1:15 5:5 96:20 97:15 102:20 132:14 142:6 157:4 159:5
academic 16:21
accepted 60:8 61:3,8
access 9:10 40:22 41:7,17 41:21,23 42:1 42:2,2,7,15,15 42:24 43:5,5 43:11,12,14,16 43:20,23 49:4 49:7,16,21 50:1,3,5,6,8,10 50:12,19,20,23 51:2,3,6,8,10 51:12 52:2,5 52:13,18,19,25 53:4,21 54:10 54:15,20 95:17 96:19,22 97:1 97:7,14,19 98:12 99:7,10 101:16,21,22 102:5 132:13 133:4,16
accessed 42:19 52:24
accessible 46:16
accordance 46:13
accuracy 159:8
accurate 108:15
acknowledged 157:15
acquired 96:14
action 45:7,10 47:13,20 158:17,19
activate 99:21
active 115:19 115:25
actively 112:15 112:21 115:11
actual 60:19 95:18 101:17 140:7
actually 10:25 26:24 36:13 74:1 106:3 118:21 122:15 133:7 134:7 141:5 142:12 153:1
add 101:6 149:19,20,22
added 40:19,20
adding 46:6 148:1
addition 23:9 60:10 96:2
additional 60:9 119:8 149:20
address 82:7
addressed 149:13
addresses 82:16
adobe 1:2 2:2 2:15 4:6 158:2 159:3
affix 157:2
aforementioned... 158:13
ago 22:15 33:5 33:7 34:21
agree 8:14,20 15:5 23:20 41:11 54:24 80:13 105:19 108:16 118:11 135:16 137:4
agreeing 109:7
agreements 159:14
ahead 101:19
algorithms 58:24 59:3
allotted 159:15
allowance 55:10,13
alter 51:24
altered 132:24
altering 52:1,3 52:12 53:4,21 54:3,16,22 55:2
alternative 96:3 99:14 103:2
amended 46:5
amendment 45:11 47:14,21 48:1,12 55:14
analysis 12:4 16:10 23:8 28:6 32:17 41:14 47:11 66:11 80:24 81:2 82:3 84:22 85:3,10 87:11,19,24 90:24 91:5,10 91:18 103:1 104:13 116:8 116:11 146:11 146:19 147:21 147:23,25 148:1 149:7 150:7,17
analyzed 115:16

JAFFE EX. 2012, Page 163 of 207
Adobe v. Jaffe, IPR2024-01352

annotated 139:19
annotation 119:8
answer 5:18 8:12 17:8 26:6 29:11 32:18 34:16 35:11 52:10 53:2 61:1,16 64:24 65:20 74:17 83:12 100:19 101:2,6 106:1 107:19 108:6,8 109:20 110:7 110:10 111:6,8 121:22 134:21 135:10 138:10 146:13 154:12 154:16
answered 48:3 52:20 86:23 88:11 93:25 94:9,10 98:17 99:11 107:5 108:5 109:6 113:6 122:5 134:10 135:8 136:12,17 137:1 143:2 153:17
answering 93:2 110:18 111:1,3 134:16 153:6
answers 8:3 26:11 85:5
antiquated 25:15
apart 24:8
appeal 1:1 4:9 158:1
appear 153:24
appearances 4:11
appeared 157:14
appearing 5:13 5:23
appendix 27:3
applicable 159:7,14
applicant's 23:19
applicants 10:25 22:1,7 22:12,16 23:1 40:19
applicants' 41:10
application 19:23 132:25
applies 61:24 62:1
argued 22:7 40:20
arrangement 77:15,16 121:7 121:11
arrived 7:10
arriving 26:19
arrow 70:1,8 70:12,12 74:25 75:1 79:14,15 79:21 80:11,12 80:15,15,18 81:1,5,19 83:15,15,20,21 83:23,25 84:1 84:3,6,8,10,12 84:16 85:7,7 85:13,16,24 86:7,12
arrows 79:18 79:24 81:2 83:25 84:23 85:1,4,6 118:25 120:9 125:10
art 10:17,21 11:5,7,12,22 13:22 14:1,3 15:4,23 16:4 17:24 22:8 40:24 59:2
article 17:5
articles 16:23
ascribe 11:13
asked 48:3 86:23 88:11 93:25 94:9 98:17 99:11 113:6 122:7 134:10 135:8 143:2 146:16 153:16,16
asking 5:20 31:24 95:3 108:1 115:5,24 140:13,14
assembly 96:7
asserted 40:24
assigned 141:5 142:13
associated 68:25 69:5
assume 119:3 145:19
atkinson 2:9 3:5 4:14,14,22 5:8,11,22 6:23 7:7 9:14,25 10:4,11 11:16 11:19,20 12:9 14:5 16:2 17:8 18:12,17 21:11 25:10 32:10,13 33:8,20 35:19 39:8 42:14 44:3,18 45:1 48:9 52:11 53:10 61:14 63:17 67:5,14 67:24 74:13 83:23 87:2,22 88:14,18 89:22 93:3,14 94:3

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 164 of 207
Adobe v. Jaffe, IPR2024-01352

94:13 98:22 99:17 106:6,23 113:11 120:3 120:14 124:3 134:15 135:11 138:1,3 139:2 139:10 143:8 144:16 145:11 147:15 148:7 153:5,7,23 154:6,8,24
attached 159:10,12
attorney 158:16,18
audio 44:16,20 61:25 151:6
austin 2:11
authentic 44:13 108:14
authenticate 58:20 116:5
authenticated 116:5 144:18 145:5,8,10,19
authentication 38:16 51:25 57:2 112:12
authenticity 38:15
authors 145:24
automatically 132:20
available 57:10 87:20 159:6
avila 3:21 150:16,18,19 150:21,25 151:3 152:17 152:23 153:15 153:24
aware 8:16 107:16,22 108:2

b

b 3:9
b1 3:12
back 7:6 10:9 21:7 28:7,9,13 29:19 36:25 38:13 42:20 44:24 49:10 51:13 55:19 59:17 65:1 67:12 68:17,24 79:9,11 101:2 106:20 115:3 117:4 118:2,7 120:5 122:18 122:23 123:1,3 123:12,23 124:2,5,8,19 125:17,18 126:6,9,10 127:18,20 129:1,2 130:12 130:15 139:8 146:12,16 147:20 150:4
bad 108:14,16 108:21,24 109:2,9,10,12 109:17 110:6,9 110:14 111:3 111:10,11,16 111:21 112:6 112:13 113:5,8 113:8,25 114:6 114:8,24 116:4
based 57:19 71:20 91:6
basically 69:2 69:23 132:4 137:6
bathroom 106:11
batkinson 2:12
beginning 4:11 5:18 7:23 48:21
behalf 4:18,25
behan 1:17 158:11,22
believe 67:19 72:15 73:16 79:11 116:22 145:25
bernd 3:18
better 88:2
beyond 11:25 52:3 58:25
big 58:16
bigger 58:15
bit 14:11 25:15 25:15 57:16 58:9 94:15 106:5 148:6
bits 56:21
black 58:15,16 119:7 125:8,8
block 56:7 75:8 75:8
board 1:1 4:9 24:11,13 70:5 70:19 92:23 124:24 158:1
boards 122:11
boast 23:8
bottom 37:21 37:23 60:2 98:9
box 9:16 68:17 68:21 71:7
boxes 125:8
braun 2:4 4:17 4:25
break 8:10,11 8:13 19:17 20:22 24:7 44:19 65:3 67:7,11 106:4 106:7,7,13,25 107:6 121:21

137:25 138:2 139:3
breaking 20:23 22:22 101:4
breaks 7:4
brief 10:8 44:23 106:19 139:7
briefly 10:5
broken 40:24 49:5,23 110:1 110:12,15 138:18,22
brought 8:25
bryan 2:9 4:14
built 92:23
burn 130:20
burned 124:17
bus 63:24 64:8 64:13
buses 64:5,19
bush 2:4

c

c 2:1
cable 31:21,25 32:2,3,5,14,20 34:13,13 75:5 75:19,21 91:17 91:18,19,20,21 91:22,23 92:2 92:4,6,7,9,12 92:17 93:9,16 93:19,19,20,23 94:5 118:1,10 122:6,8,20 124:1,14,16,20 125:20 127:5 127:20 129:10 130:17,18,19 130:21
cables 25:12 31:15 34:18 64:22,22 76:13 117:5,12,17,20 117:24 118:12 118:17 122:4 122:13,16,22 124:5,8 125:24 126:5,8,17,19 126:22 127:2 127:10,11,24 128:11,12,15 128:15,18,25 129:17,23 130:2,4,8
california 2:5
call 24:15 56:10,20 70:18 130:16 154:19
called 9:13 71:6 71:7 82:7 153:1
camera 39:13 40:5 54:5 65:14,17 68:1 68:4,22,25 69:3,5,6 70:2,9 70:15 71:6 72:24 75:15 76:3,6,9,20 78:7 83:11 86:25 90:21 91:2,7 92:7 114:22 117:2,6 117:21,21,25 118:20,22 120:13 121:9 121:23,24 131:7 133:17 133:20 134:24 136:5 138:15 150:22
cameras 76:10 87:7,9,12,15,20 90:20 91:3,8 151:1
capacitor 24:20
caption 158:12
capture 78:6
captures 78:11
caricature 146:18
carmack 2:15 5:2 6:10,12,13 6:16,22 7:1,5
carve 82:1
case 4:6,7 23:18 52:23 58:5 75:22 92:8 122:9 142:16 153:21
cases 7:14,16 7:18 109:24 152:8
cause 1:16 52:5 96:1 124:17 158:14
causes 52:2 99:20,24 100:20 131:15 131:24 136:13 137:5
ccd 28:15,23 72:24 78:5 79:4 80:8 116:25 117:2 119:13 121:9 121:23 125:22 125:22 128:2,9 129:7,21 130:6
ccds 118:6
ccr 1:17 158:11 158:22
center 58:13 98:21
certain 20:9
certainty 92:25 93:6,7 94:4
certification 3:7 158:9
certified 1:17 5:5 159:16
certify 158:12 158:16

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 166 of 207
Adobe v. Jaffe, IPR2024-01352

challenged 12:4 41:14
chance 137:24
change 23:24 47:25 54:4 58:9 114:8 131:14,23,24 132:18 136:20 156:5
changes 3:6 156:1 157:3 159:9
changing 54:7 54:8,16,22 55:3
channel 144:1
characteristics 77:16 121:7
characterizati... 109:8
charged 78:6
chart 143:23
chassis 96:4 99:15,18,20 102:13,16,23 103:5,8,10,15 103:23,24,25 104:3,5,11,14 104:19,23,25 105:3,5,8,19,22 106:9 107:1,4 107:9
check 107:10 141:2,3,3,7,8 141:18 142:7 142:15 143:5,6 143:9,12 145:3
checked 142:11
checking 144:12
checks 142:19
chip 117:3 131:25 132:21
cinema 153:9 153:12,19 154:4
circuit 24:10 70:4,18 92:23 122:10 124:17 124:24
cite 72:1,5,6 120:20
cited 22:8 60:14 113:9 128:24 140:11
citing 71:3 101:6
claim 10:18 12:19,21,23 13:2,4,16 14:8 14:10 16:6,9 16:11 19:22 21:5 23:11,23 28:8,8 29:10 30:14 41:3 44:8,9,12 47:15,19 48:13 48:22,23 63:5 63:16 64:20 77:6 146:24 147:5,20 148:10,14,23 148:25 149:4,4 149:19 150:8
claimed 46:13
claims 12:5 41:14 46:6
clarify 8:8 11:3 38:5 111:17
clear 89:12 126:14 127:13 136:11 149:1
client 4:19 5:2 6:10
clock 117:4 118:7 123:1,3 123:5,12 125:6
close 53:23 75:17
closer 60:24
code 153:11
coded 154:20 154:21
codes 96:15
coll 31:16
column 38:11 39:9 55:22 59:19 60:2,15 62:3 68:7 69:13 72:2,6 72:12,15 82:18 82:18,21 85:21 88:3 89:5 90:4 94:14,22,23 105:24 107:2,8 107:18,18 108:4 151:3
combination 147:12,22 148:12 149:11 149:24
combine 90:3
come 53:20 54:21,21 55:1
coming 21:3 53:23 149:8
comm 81:14,18 81:22 82:25 83:6,19 84:8
commercially 57:9
commission 157:24
common 87:1 153:20
commonly 57:13 59:10,16 86:25 87:8,19 87:23
comms 81:20 84:9,11
communicate 8:21
communication 115:12

JAFFE EX. 2012, Page 167 of 207
Adobe v. Jaffe, IPR2024-01352

communicati... 6:21 7:1 84:17
compartment 117:6 118:20 131:7,10 132:16,18 133:8,15 135:15,22,23 136:2,19
compartments 136:25
competition 123:20
complete 8:17 92:14
completely 58:10,19 108:16 109:7
compliance 60:11
compliant 61:7
component 82:3 85:22 110:12,12 123:19 133:2
components 22:25 23:1 24:15,19 64:13 70:16 71:14,17 73:1 74:2,23 75:13,17,24 76:15 81:9 88:2 91:12 117:1 119:16 120:11 121:17 121:19 122:20 124:4,7,9,11 126:5,15,25 127:5 128:2,7 130:6,8 132:5
compress 154:23
compressed 152:21 153:21
comprised 151:8,14
compromised 43:20,25 44:5 44:7 96:16
computed 56:7
computer 14:24 15:2,7,7 26:18 30:8,10 31:22 32:15 36:12,23 37:4 37:17,17 38:4 52:23 63:24 64:11,12 65:8 65:8,15,18 74:9,14 82:11 82:15,19,23 83:4,5,11 87:7 117:6,14 158:15
computers 25:18,22 26:8 29:13,17 30:3 30:6,19,24 31:14,18 33:7 33:23 64:6
computing 124:22
con 29:6
concentrates 66:11 80:25
concept 125:20
concerning 158:14
concluded 155:6
conclusion 42:23 69:24 98:23 120:17 150:12
conclusions 21:3 47:15
condense 131:19
conduct 70:21
conducted 24:16
conductive 12:7 13:10 20:23 22:22,24 23:5,15 24:3,5 24:9,11 25:7,8 29:21 31:13,20 31:21,25 32:16 33:9,25 34:9 63:22 70:4,10 70:18,21 71:18 72:11,17 73:3 73:6,7,11,18 74:6,9,16,21 75:4,9,11,18,24 76:18,24 77:7 77:8 80:21 81:10 84:7 86:16 88:8 89:17,24 90:8 91:16 92:22 94:11 119:17 119:21 120:12 120:23 121:19 122:1,11 126:24 127:11 128:8,18 129:15,18 130:2,4,9 131:5
configuration 72:19
confused 14:11
connec 33:21
connect 24:21 34:18 75:16,23 76:18 93:8,15 93:22 121:25 123:2 126:9 129:9
connected 13:18,20 17:2 25:19,25,25 26:8 29:5,8,12 29:16 30:21 31:1,12,19

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 168 of 207
Adobe v. Jaffe, IPR2024-01352

33:7,9,11 34:8
70:3,9,14,17,17
71:11,17 72:17
73:22,25 74:5
75:3,5,9,11,21
77:20 81:10
82:23 84:5
86:5 90:6
119:17,21
120:11 121:10
122:20 123:24
124:1,5,8
125:23 126:5
126:16 128:10
128:11 129:22

connecting
34:11 71:14
73:1 90:7
127:20

connection
24:13 27:15
28:1 29:25
31:17 34:7
49:19 50:5
63:24,25 64:13
65:17 72:10,11
74:6,14,20,21
75:7 76:24
79:12,18 80:2
80:2,25 83:3,5
83:11,19 85:12
86:3,11,16
88:16,19,22
89:14 91:14
92:11,12 98:6
100:4,10 101:5
118:1 121:18
122:3,23 123:2
123:9,12 124:1
124:19,20
126:8,19,21
127:2,4,5,20,24
128:1,14,25
129:1,6,8
130:1,5,12,17
130:20 133:16
134:4 138:17
138:22

connection's
79:4

connections
17:10 26:17
33:12,22 34:2
46:14 74:8
79:17 80:6,7
81:3 86:6
125:1,2,4,5,12
126:23 127:10
127:11 128:8
129:14 130:1,3
130:7 131:4

connective 29:6
29:9 33:11,15
33:24 34:4,13
46:20 63:1,9
63:18 64:19,22
65:11,18,25
66:18,21 67:2
81:5 83:7
130:23

connector
32:21 117:5,12
117:17,20,24
118:10,12,17
122:4,13,16,22
124:5,8 125:24
126:5,16,22
127:9,11
128:11,12,18
129:10,23
130:1,3,8,21

connects 127:7

consequences
132:1 136:22

consequently
85:22

consider 26:17
45:24 47:12,12
47:14,20,21
48:1,5

consideration
157:16

considered
23:1,16 26:13
45:21 52:16,21
115:16

consistent
141:18

consists 62:18

constitute
54:10,15

constructing
110:20,24

construction
23:11,23 28:8
29:11 41:3
47:16,19 48:13
71:20 77:6

consult 17:24

consumer's
151:16

consumption
130:11 131:1,3

contain 76:13
101:14

contained
60:10 71:12
132:5

contains 40:25
68:21,25 95:15
117:3

content 9:13

context 10:18
11:23 12:9,13
12:15 13:15,25
15:21 16:8
21:5 49:18
57:22 62:24
63:4,15,16,19
63:20,23 64:10
64:20 65:12
129:19

continue
152:13

Veritext Legal Solutions
800-336-4000

JAFFE EX. 2012, Page 169 of 207
Adobe v. Jaffe, IPR2024-01352

continues 116:20
contradictory 111:14 128:14
contrary 47:3
control 72:21 96:5
controversy 158:14
convenient 67:6
convention 79:21 80:18
copies 11:18
copper 24:12 24:14,14
copy 18:18,18 18:21 119:8 125:8 159:16
correct 5:14,24 6:4,5,15 7:25 8:1,8 14:15,18 14:24 35:16 38:4 45:25 55:5,15,16 62:9,13 67:20 68:2 72:8 79:6 79:7,14 83:22 94:5,6 102:9 104:7 111:25 112:9 117:12 117:22,25 118:12,17 119:19 122:14 122:25 125:15 125:16 126:17 132:5 133:8 137:6,10 143:1 147:9,21 148:3 152:7 157:3
correctly 112:7 135:25
corres 37:9
correspond 37:10
corresponding 19:22
corresponds 38:3
counsel 2:15 4:10,12 5:16 5:19 6:1 97:3 106:12 107:5 108:5,12 115:22 121:20 137:18 154:12 155:1 158:17 158:18
county 157:11
couple 38:9 95:3 120:18
coupled 10:17 10:23 11:6,13 11:24 12:6,6,8 12:10,11,18,22 12:24 13:3,7 13:10,13,14,20 14:2,4 15:14 15:20 16:5,13 16:14,24 17:1 17:4,23 18:4,6 20:20 21:5 22:10 23:2,3,4 23:14,14,25 28:4,10 29:20 30:15 38:16 46:9 59:21 62:4,22,23 63:14 71:20 77:5 78:6 120:22 121:15
coupled' 22:18 22:20
coupling 11:2 16:7 22:2 23:1 28:11 39:14,18 40:6,13 41:5,7 41:15,17,21 42:8,17,22,25 43:6,8,14,16,25 44:4,6 46:14 49:18 62:25 63:4,7,15 96:17,19,25 97:5,12,14,17 97:20,21 98:11 98:13,20,24 99:1,5,7 132:11,13 133:5
course 27:2 78:4 119:7
court 3:17 4:20 5:5,17 8:2 23:11,23 24:24 25:3 32:7,11 38:25 44:10,15 120:3 137:24
court's 41:3,13
covered 15:15
cpu 117:2 123:20,24 124:2,20 125:6 125:20 126:9 126:10 127:8 127:21 129:1,3 130:13,13,16 130:25 131:2
cpus 118:7
crank 145:13 145:15,21
cranked 146:4
create 60:13,25
created 59:25 60:7
creating 58:24 59:7
crenshaw 2:18
cryptography 57:13
csr 1:17 158:11 158:22,23
current 124:13 124:16 127:22 130:15,18,19

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 170 of 207
Adobe v. Jaffe, IPR2024-01352

d

d 2:9 3:2
damaged 110:6
data 44:13 56:9 57:13 62:8,10 62:12,12,16,18 71:14,16 72:1 72:20 73:1,2,5 73:6,10,12,14 73:15,17 74:19 75:2 81:8 88:6 90:5 116:24 119:1 120:10 124:22 132:23 132:24
date 4:4 54:5 158:23
david 2:18
day 11:17 18:17 157:14 157:19 158:20
dec 26:14
declaration 3:11 9:20 10:13 12:1,3 18:7 21:8,17 26:15,20,22 29:20 39:21 42:21 43:18 45:22 47:11,25 48:16 52:22 57:5 58:13 64:17 67:16 80:24 85:10 95:9 97:10 99:4,13 101:8 108:11 115:17 117:10 138:14 140:14 141:16 146:12,22 149:14 150:17
deep 17:6
define 91:23
definition 17:23
definitions 17:25
definitive 108:8
degrees 125:11
deleted 131:15 131:25
deletes 132:20
deleting 136:22
deletion 137:8
denote 3:24
depending 140:8
depends 114:16
depicted 80:3 105:17
depiction 37:3 37:7 38:3 146:4
deposed 7:13 7:16,21
deposition 1:9 1:13 4:5 6:20 6:22,25 7:2,5 7:22 8:22,25 9:2 73:9 155:6 157:2 158:9,15 158:17 159:4
describe 36:11 36:14 56:13 57:11 86:10 97:16 104:24 105:2 121:18 137:16 150:22 151:1
described 11:1 22:1 89:1 100:25 103:9 103:10 105:12 107:2,4 110:17 110:21,25 117:21,22,25 127:23 137:9
describes 95:10 96:2 99:14 103:17 105:22
describing 86:4 108:13
description 3:10 22:25 36:10 68:12 70:20 85:20 88:9,16 98:25 103:15,18 105:4 141:22
descriptions 36:5
design 96:3 99:14 103:7
designed 151:15
designs 103:2 105:16
destruction 95:18 96:1 99:24 100:21 101:17 102:7
detailed 26:6 26:11
details 25:22 26:5
detect 39:13,18 40:6,13 94:17 95:1,7,12,22
detected 98:2 132:19 136:21 138:23
detecting 95:21
detection 95:18 97:25 101:17 102:6 132:24
detector 96:4 99:15,19,20 102:14,16,24 103:6,8,10,16 103:23,24 104:1,4,6,11,14 104:15,17,20 104:23,25 105:3,8,20,23 106:9 107:1,4

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 171 of 207
Adobe v. Jaffe, IPR2024-01352

107:9
determination 111:10,11,15 111:25 112:8,9 112:17,23 113:4,5,17,18 114:15,20 115:9,13,21 116:2 136:13
determine 42:6 57:19 69:21 93:5 99:9 111:10 114:10 114:12 133:15 135:14 136:1 141:4 142:12
determined 23:13 41:4
determines 112:12 114:13 133:4
determining 41:6,16 42:16 42:24 96:18,22 97:1,6,13,19 98:12 99:6 132:12 133:2
device 6:14 15:15 31:3,6 40:22 49:3,21 74:15 76:14 78:6 79:2 89:16 90:17 95:19,25 99:23 100:20,22 101:17 102:7 111:9 117:12 117:21,21 151:16
devices 78:7 90:15 123:9
dickinson 2:9 4:15
dickinsonwri... 2:12
dictionaries 18:8
dictionary 17:19,24 18:3 18:7
difference 58:14 80:1 84:12
different 48:7 50:14 54:6 58:11,18,19,21 58:23 61:21 62:23 63:4,20 76:15 103:2 104:15,22 105:9,10,13,15 105:20 107:13 114:17,18 115:4 127:3,6 149:4
difficult 25:4 95:16 101:15
digital 3:16 56:6,18 57:8 58:25 59:3,7 61:6,6 74:15 76:10 77:25 78:7,8,21 85:23 88:4,22 89:6 117:21,25 151:1 153:3,9 153:12,19,21 154:4
digitized 85:25
digitizer 68:22 69:8,9,11,11,14 69:21 70:2,9 71:10 73:16,21 74:3 75:7,8 76:15 79:13 83:16,21 84:1 85:8,23 89:13 90:6 93:16,22
direct 72:23 123:2
direction 84:16
directly 84:15 150:21,23
dis 46:7
disagree 150:24
discard 71:21
disclose 147:14 148:13,18,22 149:5
disclosed 150:1
discloses 77:4 77:15 96:16 97:11 98:10 99:4 120:21 121:6,15 132:7 132:10 149:14
disclosure 40:25
disconnected 134:5
discuss 85:12 85:15
discussed 71:21 96:20 97:15 132:14
discussing 46:5 46:8 47:5
discussion 46:18
disk 25:14,16 25:18 27:23 29:4,6 37:7 62:18,19 79:1
display 142:18 144:5
displayed 140:15 141:9 142:14 143:14 143:15,21,24 144:4,7 145:16 146:2,9
disruption 100:1,10,18

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 172 of 207
Adobe v. Jaffe, IPR2024-01352

district 23:11 23:18,23 41:3
diversion 142:23
document 3:16 3:24 39:1 53:18 119:23 140:24 150:16
documents 146:25 147:6,6 148:18,21
doing 8:9 81:23 95:22
door 50:22,23
dotted 68:17,21 72:22 118:22
double 81:19 84:11
dr 4:5 5:9 10:12 45:2 53:19 67:15 106:25 138:4 139:11
drawn 79:19
drill 137:4
drilled 131:14 131:23 132:18 133:3 135:15 135:24 136:2 136:19 138:9
drilling 131:22
drive 15:12 25:25 26:19 27:11,11,13,16 27:19,24 28:2 28:5 29:7,9,21 31:2,6,11,11,17 34:12,23 35:3 35:6,13 37:2,9 37:10,16,21,25 38:2,3,10,21 39:5 78:12,20 78:21 79:5
drives 25:14,16 25:18,19,23 26:7 29:12,16 30:12,20,25 32:23 33:6,14 33:23 34:4,18
drop 11:17
dropped 18:17
duly 1:15 5:4 158:13
duration 8:21

e

e 1:6 2:1,1,8 3:2 3:9 4:7 158:6 159:3
earlier 17:2 18:1 28:7 33:8 41:20 45:11 52:20 60:14 63:5 65:3 71:21 80:23 81:6,12 84:4 84:14 86:13 90:15,19 100:20 102:13 108:5 110:18 113:9 122:2,5 122:6 127:6,7 127:16 128:24 130:13 147:22 149:13
early 21:11 149:12
easier 18:22,22
echo 39:25
echoes 22:13
effect 97:25
effectivity 57:18
either 45:17 46:23 59:11 72:10,10,16 74:20 75:20,24 109:16 119:20 122:10 128:17 141:8,23 142:4 146:3 151:1
elaborate 35:25 43:8
electric 72:16 124:14 132:3 134:8 135:7,14 135:22 136:1 137:16
electrical 63:25 72:10 74:8,14 74:15,20 131:11 132:17
electrically 70:3,10 71:11 71:17 72:17 73:22,25 81:10 119:17,21 120:11
electronic 119:8
element 28:14 28:17 35:3 36:11,13,22 37:6 124:22 147:4,8 148:3
elements 44:9 44:12 59:22 95:17 101:16 101:21 102:6 147:20 148:10 149:4
embodi 28:21
embodiment 28:14,18,20,20 28:22 29:1,2 35:5 90:20
emoticon 143:10
emphasize 133:25
employed 158:17,18
employee 158:18
enabled 98:1

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 173 of 207
Adobe v. Jaffe, IPR2024-01352

enclosed 95:11
encode 154:19
encoded 153:10
encountered 16:14 17:3
energy 131:1
engineering 124:14
ensure 96:14
ensures 132:23
entire 95:15 101:13
errata 159:10 159:12,13
error 139:25 140:21,21,22
esq 2:3,9
essential 96:14
event 100:7
everybody 10:6 67:9 155:4
evidence 63:11 123:16
ex 91:2 102:4 150:19
exact 3:24
exactly 80:10 138:21
examination 5:7 158:14
examined 5:5
examines 53:18 119:23 140:24
example 12:16 15:11 20:14,14 20:17 22:13,14 22:16 24:19,22 28:25 32:3 34:13,22 35:1 35:8,13 40:21 43:16,20,24 44:5 49:3 50:22 51:10,14 52:2,13 53:3,9 53:24 54:2,3,4 54:4,5 56:14 56:21 57:2 59:8 61:6 64:8 64:14 79:1 82:21 92:9 99:23 101:4 102:10,14 105:14,18 109:25 110:1 110:11 112:4 123:11,22 125:17 132:16 138:17 143:15 143:25 144:13 151:4 152:10 154:4
examples 15:6 15:13 35:9 51:11 52:3 53:12,17,20 54:6,8,9,20,25 55:2 56:14 59:6 64:12 90:22 101:11 101:23 102:12 138:24 154:22
except 157:3
exclusively 87:23
executed 157:15
exemplary 19:18,21 20:2 20:5,6,6,10,12 20:14,16 22:14
exhaustive 115:15
exhibit 3:11,12 3:13,15,16,19 3:20,21 9:11 9:16,18,19,23 18:10,14,14,14 18:15,25 21:10 35:17,21 45:3 46:25 55:20 65:4,5 67:16 67:19,22 68:6 119:22 120:1 138:6
exhibits 3:10 3:23 11:18 147:1,2
exif 3:19,20 146:24 147:13 148:2,11,11,13 148:17,21 149:19 150:1,2 150:7
exist 14:13 15:7 23:24
existed 33:12
existence 91:4
exists 14:17,23
experience 32:25
expiration 158:23
expires 157:24
explain 26:14 57:3 134:23 153:3
explained 71:19 81:11 86:13 102:4 107:13 130:10 151:12
explaining 22:19
explains 40:4 95:14 96:13 101:13 127:15
explanation 56:11
explicitly 117:11 142:25
explore 152:18
expressed 157:16
extent 20:9

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 174 of 207
Adobe v. Jaffe, IPR2024-01352

external 125:14
extra 153:3
extremely 95:16 101:15

f

face 139:17,23 140:1,3,5,15,17 140:18 141:4,9 141:9,11,12,12 141:14,15,20 141:23,24 142:5,5,18,25 143:6,7,7,10 144:8,19,19,23 144:23 145:4,4 145:8,18 146:14
faces 141:19 142:10,10 143:12 144:8 144:13 146:17
facilitates 61:20
fact 27:9 114:5 114:8,11 140:17
facts 158:12
fails 159:15
fair 54:19
falls 123:1
false 20:22 22:21
familiar 9:5 25:11,16 26:7 35:23 64:5
far 54:16,21 103:14
farella 2:4 4:17 4:25 5:16
fbm.com 2:6 159:1
feature 19:22
feedback 44:20
fifth 22:4
fig 35:15 72:20
figure 19:22 22:17 27:4,6,8 27:13,16,17 28:5,13 29:3 29:10 34:22 35:2,6,10,15,21 35:24 36:2,5,8 36:10,14,23,25 37:10,11,13,14 37:14,20,21,23 38:4,8,20,22 39:4 58:1,2,12 60:6 65:1,2,5 65:21 66:22 68:12,18 70:13 71:3,4,9,13 72:25 73:20,20 75:1,9 76:15 77:20,24 78:3 78:4,19 79:3,7 79:9,11,16,20 80:3,7,9,17,19 80:20 81:13,16 81:17,25 82:2 82:25 83:4,22 84:24 85:1 88:24 89:1,12 90:4 91:13 93:23 102:17 102:20,24 104:2 112:3,11 119:1,3,5 120:9 121:6,8 121:11,13,14 125:1,5,21 126:6 127:18 129:7,21 139:18 140:4,7 140:18,25 141:17,25 142:2,7,9 143:6,13 144:7 145:2,20 146:9
figures 77:18 79:19 80:4 143:14
file 56:8,9,18 56:19,20 60:5 60:10,15,16,17 61:2,6,7,9,17 61:18,20,22 108:18,25 109:2,6,9,13,15 109:22 111:12 112:16,21,25 113:2,7,18,20 114:23 115:9 115:11,21 116:2,4 152:9 152:9
filed 4:7
files 9:13 59:25 60:6,9 108:14 109:24 150:22 151:1,5,12,13 151:23,24 152:3,6,7,16,23
financially 158:19
find 17:22 70:7 85:18 103:13 105:25 106:12 114:3 138:5 140:22 149:18 151:21
finding 76:25
fine 24:8 139:4
finish 23:7 93:2 101:20 105:5 154:12
finished 48:6
firm 4:15 5:15 6:2,3,4,6 158:24
first 5:4 8:12 10:25 19:16 21:24 24:5 27:19 38:14 39:25 40:3

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 175 of 207
Adobe v. Jaffe, IPR2024-01352

57:25 58:16 60:5 64:3 68:3 77:14 98:19 99:22 101:4 104:10 105:7 107:10 108:23 110:7,18 111:14 112:19 115:10,23 131:9 133:12 134:23 135:21 139:24 140:19 141:13 151:6 151:12 152:20 152:22

fixed 56:10,20

flash 15:11 65:23 66:3,5

flexibility 18:24

flop 37:6

floppy 25:14,16 25:18,19,23,24 26:7,18 27:11 27:11,13,16,19 28:2,5 29:4,6,7 29:9,12,16,21 30:12,19,25 31:2,6,11,11,17 32:23 33:6,14 33:23 34:3,12 34:18,23 35:2 35:3,6,13 37:2 37:7,9,10,16,21 38:2,3,10,21 39:5 78:12,19 78:21 79:1,5

flow 127:22

fly 151:15

focus 27:4 74:2 116:8 146:11 146:19

focused 85:11

focuses 80:25

focusing 87:19

folder 9:12

follow 45:10

followed 55:13

following 41:9 49:1 57:5

follows 5:6

foregoing 157:2,15

form 33:14,24 33:25 34:4 105:8,9,20,21 139:19

format 60:5,7 60:12,15,16,17 60:20 61:2,7 61:10,17,18,20 61:22 153:10

formats 152:16

forming 26:14 45:21

forms 104:22 104:25 105:2

forward 57:14

found 34:23 85:20 96:7 138:7

fourth 20:19 47:2 97:24 101:12 102:15

frame 68:23 69:9,9,11,15,16 69:17,18,21,24 69:25 70:2,9 71:10 73:16,22 74:3 75:8 76:16 77:25 78:9,21 79:13 83:16,22 84:2 85:9 86:1 87:6 88:5,23 89:7 89:13 90:6 93:9,16,22 100:4,11 101:5 151:16,18,24 152:9,11,12,13 152:14,19,20 152:21,22 153:1,10,20 154:19,20,20 154:21,23

frames 151:9 151:15 152:2,7 152:13 153:11

francisco 2:5 5:16 6:1,7

friday 1:16 4:2 4:4 156:3 158:10

front 32:8

frowned 145:4

frowning 139:17,22 140:3,5,15,17 141:4,9,12,15 141:19,19,23 142:5,10,18,24 143:7 144:19 144:23 146:14 146:17

frowny 144:8

full 5:9 47:4

function 56:6 56:12,15 57:12 57:16,17,21,24 58:4,18 59:11 59:25 96:6

functionality 9:11 96:11

functioning 96:6

functions 59:6

funny 140:1 145:4

further 69:18 70:22 77:8 78:18 120:24 121:8,14 158:16,18

furthermore 40:18

g

g 5:12
gain 49:16 50:12
gained 41:7,17 42:8,25 50:10 96:19 97:1,7 97:14,19 98:13 99:7,10 132:13 133:4,16
gaining 42:15 43:5,14,16 52:13,25 53:4 54:20
gen 17:4
general 13:20 14:6,6,16 15:5 15:15 16:22,23 16:25 17:4,5 17:10,19,22 24:22 25:7 26:4,8,10,18 29:13,17 30:2 30:6,10,18,24 31:8,14,18,22 32:14 33:23 36:12,19,23 37:3,16,17 54:24 56:4 64:7 89:20 109:1 130:16
generally 10:23 13:19 14:13 15:4,21 16:17 16:18 17:1,17 20:16 25:19 30:11 32:24 34:3 35:23 36:8 60:7 61:2 61:8 85:2 95:5 109:5
generate 22:10 46:10 58:4,19 140:20
generated 40:21 49:3,21 57:8 133:18
generates 57:16 139:25
generation 38:16 116:25 133:22 134:2 135:2 136:10
generator 65:24 66:3,5
gentleman's 119:11
gesturing 8:4
getting 19:9 25:21 44:16
give 51:11 53:15,22 54:2 54:12 105:25 107:20 108:7,8 135:9 137:18 138:10 151:21
given 120:18 141:5 142:12 157:18 158:15 158:20
gives 105:13
glass 3:15 67:18 70:7,20 72:1,6 73:25 76:1,20 77:1,4 77:10,14,16,19 79:11,16,18,20 80:2,7,17,17,18 81:16,17,22 82:10,10,14,14 82:16 85:13,15 85:17 86:20 87:3 88:10,16 88:20 89:2 91:4 94:22,23 95:5,7,10,14,24 96:2,9,13,16 97:2,8,11,16,24 98:4,5,10,16,19 98:23 99:1,4 99:13 101:13 103:11,13,18 103:18 104:25 105:2,5,13,16 105:22 107:3 107:17 110:17 110:21,25 121:20 122:2 142:16 147:13 148:13 149:8 149:11,14,25
go 7:6 10:4,7 17:18 21:13 22:4,12 29:19 36:16,16 37:20 41:2 51:13 57:20 58:2,5 69:13 70:22 71:22 77:2,13 77:14,18 79:9 79:11 84:17 94:14 95:14,23 96:12 97:23 101:2,7,19 106:10,15,16 115:3 121:1,5 137:13 146:12 146:16 149:3 150:4
goal 101:25
goes 52:8 66:8 72:22 110:13
going 9:19 10:7 12:2 22:18 28:7,9,13 42:20 44:19,21 49:10 67:5,10 68:17,24 86:18 90:2 100:21 106:5,17 125:10 126:6 138:10 139:5 151:11 155:5

JAFFE EX. 2012, Page 177 of 207
Adobe v. Jaffe, IPR2024-01352

good 5:11 20:14 56:11 108:17 109:2 109:10,12 110:9 111:3,9 111:11,15,21 113:5 114:1,2 114:6,23 116:3
gotta 19:8 38:13
gotten 138:12
gps 54:6 65:8
graphics 151:7
guess 19:15 22:8 47:1 84:18 94:24 98:4 115:5 125:9 146:18

h

h 3:9
ha 58:21 59:14
half 140:11
halfway 139:16
hand 4:22 58:23 76:11 81:13 119:10 119:14 145:13 145:15,21 146:4 157:18 158:20
handful 154:22
handheld 76:10 76:12,14,21 86:25 87:3,7,9 87:13,14,20 90:16,20,21 91:1,3,7,8 114:22 121:23
hands 32:8
hang 9:12 19:8
hap 43:15
happen 102:1
happening 145:12
happens 131:21
hard 18:18,21 24:25 32:9
harder 25:1
hash 56:10,21 57:12,16,16,19 57:21,24 58:3 58:4,6,10,18,19 58:21 59:10,15 59:25 141:5 142:12,23,23
hashes 57:1
hashing 56:12 56:15,23 145:25 146:5
hazard 84:18
head 8:4 17:7 20:3 50:15 51:9 52:10 54:11 59:13 61:24 64:9 82:9 83:1 84:19 106:1 119:11
headed 84:12
hear 7:15
heard 11:5 14:1
heavy 127:21
hereto 158:12 158:18
high 130:14,18
higher 124:16
history 3:13 18:15 19:1 23:10,17,20 41:11 45:3 46:3 48:14 49:13 55:7,18 77:9 120:25 121:4
hold 19:4 21:18 38:13,13 51:19 65:2 79:10 101:8 147:1
host 81:20 82:5 82:8,10,15,19 82:23,24 83:3 83:4,5,11,20 84:9,11
hour 44:19 67:6 106:5
housing 117:7 118:17,20 123:7 124:12 125:14,18 131:7 132:4 133:6,8 134:9 137:5
hypothetical 34:15 50:24 52:15,22 53:1 64:1,16,25 110:21,24 111:7 115:14 123:18

i

i.e. 135:3
idea 32:19
ideas 26:4,10
identical 58:3
identification 9:24 18:11 35:18 67:23 120:2
identified 126:11
identifies 78:4
identify 36:15 85:22
illustrate 77:25 83:20 119:1 145:25
illustrated 22:17 35:1,5 35:10,15,24 36:2,8 37:2,3 37:16 57:25 66:22 80:3,20 81:8 83:14,20

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 178 of 207
Adobe v. Jaffe, IPR2024-01352

102:17,18,24
104:20 119:2
125:1,4
illustrates
71:14 73:1
112:4,5,11
120:10
illustration
104:19 144:2
145:23 146:5,7
illustrations
143:25 146:8
image 3:17
56:19 57:23
58:9,13,16
59:21 61:7,22
62:4,8,10,12,20
63:8,14 68:20
78:9,11,16,17
78:25 83:15,21
84:1 85:23,24
85:25 88:4
89:6,13 90:5
91:15 96:15
101:5,23
109:12,16
110:9,14 111:3
111:21 112:6
112:12,13
113:8 114:1,6
114:8 116:5,24
125:18 132:24
133:21,21,22
134:1,13,25
135:1,2,6
136:6,7,9
138:16,16,20
139:17,23
140:6 144:20
145:5,9,15,19
146:14 150:22
150:22 151:1
151:13,18,24
151:25 152:1,6
152:16,16,21
153:22
imager 71:10
72:23 73:15,21
74:2 75:7
79:12 84:1
85:8,8,22
93:15,22
images 58:3,6
58:17,20,22
61:23 62:1
78:7 108:14
139:24 142:21
142:25 144:1,3
144:14,14,17
144:18,19,22
145:1,6,14
146:19 151:7
151:19 152:4
imaging 68:16
68:25 70:5,13
70:15 71:12,18
72:20 75:1,2
77:19 81:11
82:22 95:10,15
101:14 133:25
immediately
58:22 143:5
implement
96:10
implies 69:6
important
85:19 93:4
113:24
impossible
20:21 22:21
57:18 92:19
93:8,15 94:8
impression
104:3
inaudible 10:3
24:22 44:20
inauth 108:14
inch 27:11,19
28:2,5 29:9
34:3,12,23
35:2,6 37:21
39:5 78:19
92:1,9 122:7
include 23:4
91:8 126:13
included 81:25
includes 68:1,5
69:3,10,11,21
69:24 77:19
101:22 121:9
including 95:10
100:21 117:2
118:16 126:24
133:17 134:3
148:14 149:2
inclusion 98:2
incorrect 13:1
150:24
independently
154:21
indicate 76:20
84:16,24 85:2
111:20
indicated 72:22
80:17 90:14,19
114:24
indicates 70:3
71:17 81:9
120:11 139:23
146:14
indicating 70:8
102:2
indication
89:11 109:24
111:21 112:5,9
112:13,16
113:8,20,22,23
113:25 114:4
114:23 115:19
116:4,11
144:12 151:19
indications
108:22 115:25
indiscernible
154:2

JAFFE EX. 2012, Page 179 of 207
Adobe v. Jaffe, IPR2024-01352

individual 153:11
industries 61:21
industry 60:8 61:3,8
information 20:22 22:22 38:16 42:3,7 42:16,17 43:5 43:7 52:24 53:5 54:7,8,17 54:22 55:3 60:9,11,20,20 62:20,21,22 77:1 89:16 126:25 128:6 129:14,17 130:11,22,25 131:2
initially 109:6
input 56:9 57:17,19,23 58:17
inputs 56:16
inserting 25:23
inside 39:6 58:15 68:21 70:5,13 71:6 74:3,23 75:14 76:3,6 86:14 118:17 125:17
instance 1:14 100:24 108:17 110:13 137:9 137:13 138:9 138:11
instances 100:25 109:23 136:16 137:7 137:12,15
instrument 157:15
insure 38:15
integrated 117:5,24 118:19 122:17
integrity 39:14 39:18 40:6,13 41:5,15 42:22 43:19,25 44:4 44:6 96:14,17 96:24 97:5,12 97:21 98:10,20 98:24 99:5 132:8,10 139:25 140:20
intend 6:20
intended 109:2
intending 6:25
intensive 123:19 130:14
inter 1:3 51:12 158:3
interconnecti... 49:17 50:13 51:3,4,12
interconnecti... 40:23 49:4,8 49:22 50:2
interested 134:19,20 158:19
interface 81:14 81:18,22 82:25 83:6,19 84:9
intermediate 134:3
internal 22:11 39:13 40:5,12 46:10 95:17 101:16,21 102:6 117:4 118:7 123:12 125:4 147:7 148:3,9
internally 125:17
interoperability 61:20
interpret 23:21 41:12
interpretation 143:9 144:6
interrupt 11:14 153:5
intra 154:21
intrusion 94:17 95:2,7,13,21 96:4 97:25 98:2 99:15,18 99:20 100:3,8 102:14,16,23 103:5,8,10,15 103:23,24,25 104:3,6,11,14 104:20,23,25 105:3,8,19,23 106:9 107:1,4 107:9
invention 46:13
involve 54:16 54:22 55:2
involved 63:18
ipr2024-01352 1:4 158:4
irrelevant 111:1 114:5,7
isa 32:5,14
issue 55:11 122:19
issues 115:4
item 82:7 118:11
items 118:6,18

j

j 154:1 158:11
jaffe 1:6 2:8 4:7 4:16 158:6 159:3
jim 11:17
job 1:24 157:25
joined 4:19 5:1 7:11

joins 7:8
jonathan 1:6 2:8 4:6,15 158:6 159:3
jpeg 152:16,21 152:22,23 153:10,12,13 153:14,21,24 154:1,5,5,23
judge 23:13 41:4
judge's 23:17
june 158:20

k

kari 1:17 5:21 25:6 120:7 158:11,22
key 38:14 117:3 131:15,24 132:20,22 136:22 137:8 144:3
keys 144:5
kind 24:12 37:7 66:7 71:24 86:18 94:15 111:14 118:21 125:10 129:11 145:13,21 146:6
know 7:6,10,20 9:15 10:1,14 15:6 16:1,13 17:13,13,16 18:2,3,4 19:11 24:14,18 26:5 26:10 27:17 32:20,22 34:16 34:20 35:12,14 36:9,11 39:1 40:17 47:24 48:5 50:6,24 50:25 52:9,15 52:18,21 53:2 53:2,4,17 54:25 58:15,20 58:22 59:3,15 60:1 63:21 68:4 69:10,19 69:23 71:5 74:19 76:23 78:5,14 81:4 81:22,25,25 82:5,8 83:12 84:11,18,20,23 85:1,7 87:4,5,8 87:20 89:9,24 91:7,9 92:1,5 101:22 102:25 103:12 104:13 104:17 105:22 106:11,13 107:11,14,15 107:20,21,24 109:9,11,16,22 109:25 110:14 110:14 111:3 112:17 113:4 113:24 114:1,1 114:7,7,8,24 115:2,4,9,15 116:3 118:6 120:23 122:13 122:19,19 123:18,22,24 123:25 124:17 124:18,19,23 124:23,24 125:10,19 126:8 127:17 127:18 128:24 129:6,13 130:14,20 136:21,25 140:22 141:12 143:5 145:2,24 146:6,25 151:21 152:12 152:25 153:2 153:19 154:4
known 57:12 157:14
knows 109:25 110:2,5,9 127:19

l

labeled 37:10 81:20 119:4
language 12:19 12:21 13:4 48:22,23 107:17 108:3 117:16 129:11
laser 80:8
law 4:15 5:15 6:2,3,4,6
lead 20:23 22:23,24 23:15 24:3,5,17,18,18 24:20 25:8,8,9 31:22 32:1,16 32:21 34:14 63:25 65:11,18 65:25 66:19 67:2 69:23 73:3,6,11,18 74:16 75:4,9 75:12,18,24,25 76:18,24 77:7 81:5 83:7 86:16 88:8 90:8 91:16 92:22 94:11 122:1,11 124:24 130:23
leads 12:7 13:11 23:5 24:23 25:7 29:6,9,22 31:13,20 33:10 33:12,15,24 34:5,9 38:22 46:20 63:1,9 63:18,22 64:19

JAFFE EX. 2012, Page 181 of 207
Adobe v. Jaffe, IPR2024-01352

64:23 66:22 70:4,10,18,21 71:18 72:11,17 73:7 74:6,9,21 77:8 80:21 81:10 84:7 89:17,25 119:17,21 120:12,23 121:19 126:24 127:12 128:8 128:19 129:16 129:18 130:2,4 130:9 131:5

learn 114:14,19

left 58:23 119:2 119:10 144:20 145:6

legal 158:24 159:19

length 56:10,18 56:20 93:20

lens 28:15,23 78:5 79:4 80:8 121:24

level 82:1

liaw 2:3 4:17 4:17,24,25 5:16 6:2,8,16 6:22 7:1,5 10:2 11:17,25 15:24 19:9 33:17 42:11 44:2 48:3 52:6 53:6 61:11 63:10 74:10 86:23 87:16 88:11,17 89:18 93:1,10 93:24 94:9 98:17 99:11 106:16 113:6 123:15 133:9 134:10 135:8 139:4 143:2 144:9,25 147:10 148:4 153:16 154:16 155:2

liaw's 6:4

light 23:19 41:10 72:23

likelihood 93:5

likely 70:4 92:22,24,24 123:25 144:14

likewise 131:1

limitation 22:16 40:20 46:6,8 148:10

limitations 147:14 148:14 148:15,16,17 148:20,21,24 149:2,2,6,7,8 149:15,21 150:1,3,8

limited 16:6 57:10

line 20:19 22:4 36:17 38:11 43:19 55:22 62:3 65:7,11 65:23,24 66:1 66:5,7,10,12,15 66:23 68:9,10 68:15,24 69:13 72:19 77:14 79:13,15 80:7 80:12,16,25 82:22,25 88:24 89:1,14 90:7 94:14,15 97:24 101:12 102:15 112:11 118:22 135:20,21 151:4 156:5

lines 24:14 36:14 39:9 59:19 72:2,4,7 72:9,15,18,21 72:22 79:6,7 79:18,24 80:19 80:20 85:21 88:3 89:5 94:23,24 95:4 107:2 143:15 143:18,19,23

list 15:10 118:3 118:12,16 122:25 123:6 123:10,14

listed 123:14 124:11

litigation 23:12

little 24:12 25:15,15 53:23 94:15 106:5 145:18 146:3 146:18

llp 2:4

load 78:17

loaded 98:1

local 47:7

located 30:4,7 30:12,20,25 32:24

locked 50:23

log 108:14,18 108:25 109:2,6 109:9,12,15,22 109:23 110:2,8 110:13 111:2 111:12,24 112:14,16,21 112:24 113:2,7 113:18,20 114:23 115:2,3 115:8,11,21 116:2,4 142:17

logging 112:5 113:22

logic 96:5

logical 76:17

logs 111:20,20 112:8

Veritext Legal Solutions
800-336-4000

JAFFE EX. 2012, Page 182 of 207
Adobe v. Jaffe, IPR2024-01352

long 56:21 91:19,21,23 93:19 97:3 101:18 116:10 118:3 131:9
look 10:24 18:3 18:5,19 24:19 26:24 27:17 29:10 44:8 56:5 58:21 74:1 76:9 78:10 80:19 81:13 85:21 106:8 108:24 110:8 111:2 125:11 128:5 128:23 129:24 135:17,20 137:20 140:7 141:18,25 143:12 144:14 147:11 153:25
looked 45:11 55:14 65:3
looking 35:22 36:5,13 47:23 48:8 57:14 89:12 108:12 110:2,15 111:11 119:7 125:7 130:24 135:19 140:9 140:13 141:11 141:25 142:9 143:10 144:13 146:23
looks 37:8,16 109:12,15,22 142:20 144:24 145:2,12,20
lot 75:20 103:6 103:7 104:18
low 130:12 131:1
lower 131:3
lunch 67:11

m

m 56:22 154:2
machine 1:18
made 56:8 58:9 74:6 86:16 111:15 112:18 122:3 126:23 127:11 128:8 130:2,4 131:4
main 102:25 104:12
majority 87:12
make 13:24 76:23 91:13 92:11,12 104:10,13 111:25 121:25 127:13 147:18
makes 73:10,17 90:5 111:9 112:8,22 113:4 113:17 130:22
making 101:25
maloney 45:15 47:5,10,23 48:5,7,12 49:11
managing 2:15
manipulation 116:24 120:13
manner 3:23
marked 9:23 18:10 28:15 35:17 67:22 120:1
martel 2:4 4:18 4:25
material 92:15 120:5
matter 6:21 41:1 142:18
matters 158:14
md5 55:25 56:2 56:4,5,11,12,16 56:22 57:1,10 57:10,11,12,15 57:21 58:4,25 59:4,7
mean 5:25 7:14 7:16 10:23 11:8,9,24 12:8 12:11,20 13:6 13:14,15,21,24 14:4,20 15:11 15:12,16,22 16:19,19,24 17:5,18,19,19 20:6,9,12 24:1 24:13,23 26:25 27:9 29:7,10 31:5 32:2 33:4 33:9 34:7 35:25 36:4,5,6 39:17 40:11 41:19,22,23 43:7,11 44:1 46:21 49:18 50:2,6,11,12,14 50:19,19 51:13 52:14 64:2 66:7 71:23 75:19 81:16 82:12,12 83:10 83:18 84:11 87:7 88:7 89:11 90:12 91:9,19 100:13 101:1 102:18 102:21 104:8 105:14 106:3 109:23 112:24 114:6,16,21 122:10 124:9 124:14 125:16 127:3 128:11 128:13 143:22 143:22 152:8
meaning 11:9 11:12 12:14

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 183 of 207
Adobe v. Jaffe, IPR2024-01352

18:3 20:13 21:4 41:24 42:1,21 43:13 77:6 154:21
meanings 50:14
means 12:6 13:9,18 16:5 16:12 17:1,10 17:16,20,20,20 20:2,5,10,14,16 20:16 22:25 23:14,21 25:7 40:21 41:6,16 42:2,15,24 43:5,23 49:2 49:16 50:20 69:17 70:8,13 86:12 89:24 90:1 96:18 97:13,20 98:12 99:6 101:18 102:5,21 107:13 132:12 141:3,18,19,20 143:6 145:4 151:25 154:2
meant 11:1 22:1 149:5
mechanism 132:23
media 27:22
memory 12:6,7 12:17,22,23,24 13:3,7,10 14:2 14:9,17,19,20 14:21,23 15:1 15:2,7,11,14,20 16:5,8 20:21 20:22,24 22:10 22:18,20,22,23 23:4,5,14,15 28:10,12 29:2 29:20 30:15 34:24 35:1,5,8 35:9,14,15 40:23 41:6,8 41:16,18,22 42:8,18,23,25 43:17 46:9,15 49:5,9,17,23 54:23 63:15 66:12 69:10,12 69:14,18,22,24 71:15,16,19 76:17 77:6,20 78:11,15,17,24 81:9 86:1 88:5 89:8 95:11 96:18,25 97:6 97:13,17,20,22 98:7,11,13,21 98:25 99:2,6,8 119:3,4,14 120:10,22 121:11,15,24 124:21 125:9 132:11,14 133:16 134:4 138:18
mention 120:8 125:13 150:22
mentioned 5:5 13:8 14:7 18:1 26:11 31:19 33:8 48:4 50:17 54:2 61:1 63:3,12 74:23 75:13,22 76:14 78:24 86:24 87:6 89:3 92:16,21 95:4 98:8 100:12,14 101:23 102:13 104:22 115:1 118:18 126:7 127:7 128:5 129:14 130:13 136:4 142:6 143:3 148:12 151:12,23 153:14,18
mentioning 107:11
mentions 60:5 140:21 152:25
merely 52:19
message 141:6 142:13
method 19:21 20:2
mic 36:19 60:24
microcomputer 36:20
middle 15:17 68:15 71:8 143:20
mind 5:19 10:12 18:13,18 26:16 45:2 67:15 90:25 91:7 97:4 116:12,13 119:24 139:11 150:15
minimum 59:21
minute 106:7 139:3 153:3
missed 112:19
misspoke 47:22
misstates 42:11 52:6 53:6 63:10 74:10 87:16 89:18 93:10,24 123:15,16 133:9 144:9
mode 153:1 154:18
modified 148:6
module 112:12
moment 22:14 116:25

JAFFE EX. 2012, Page 184 of 207
Adobe v. Jaffe, IPR2024-01352

monitor 38:8,9 39:17,18 42:6
monitored 39:13 40:6,12 98:16 133:6,7 134:8,19,20 136:8,25 137:1 137:3
monitoring 40:19 41:4,15 42:22 48:21 96:9,16,24 97:5,11,16,21 98:5,6,10,15 99:1,4 132:4,7 132:10 133:14 133:24 134:5 134:12 135:7 135:18 136:6,7 136:16
monitors 98:20 98:24
morning 5:11 78:13 80:23
mother 30:9
motherboard 30:8,10,20,21 31:1,1,4,7,12 31:17 33:22
motherboards 29:13,17 30:4 30:7,13 32:24 33:7,14
motion 153:2,4 153:9 154:2,5 154:10
mouth 4:23 32:9
move 60:24 77:22
mpeg 151:9,9 151:14,16,17 151:17,18,24 152:6,19,21,25 153:1,2,4,9,20 153:25 154:1 154:18,22,22
multi 92:17
multimedia 151:5,6,12,23 152:5
multiple 92:4,8 92:10 108:5 151:9,14
multiplexer 86:1 88:4 89:7
muted 106:22 106:22

n

n 2:1 3:2 5:12
name 4:21 5:10 5:11 157:15
named 158:13
nat 86:3
nature 85:16 86:11 88:19
necessarily 3:24 15:15,21 16:17 62:12 75:20 90:16 109:20,21 110:10 111:7 123:8
necessary 123:9,11,11
need 8:3,10 10:5,5 54:1 113:14 119:22 140:6 147:1 150:16
needs 145:3
negative 24:22
neither 52:24 158:16
network 96:15
nodding 8:4
non 87:9,14 90:21 91:3,8 92:20 94:7 96:6
nonresponsive 154:6,14
notarize 159:11
notary 157:22
note 3:23 87:24 159:9
noted 157:3
notice 7:9 55:10,13
noticed 8:9
number 19:5 140:8
numbered 1:16

o

o 5:12
oath 4:13 7:23 7:24 157:14
object 15:24 113:6 154:13
objection 11:25 33:17 42:11 44:2 48:3 52:6 53:6 61:11 63:10 74:10 86:23 87:16 88:11,17 89:18 93:10,24 94:9 98:17 99:11 123:15 133:9 134:10 135:8 143:2 144:9,25 147:10 148:4 153:16 154:6
obtained 50:7
obtaining 42:2
obvious 144:12
occurrences 107:15,16
offer 63:21 66:25 81:2 146:20

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 185 of 207
Adobe v. Jaffe, IPR2024-01352

offered 26:3
office 1:1 4:8 45:7,10 47:13 47:20 157:18 158:1,20
offices 6:6
offload 130:25
oh 11:16 51:17 70:24 71:23
okay 6:8,12,16 6:19 7:4,8,13 7:23 8:2,6,10 8:16,20,24 9:2 9:8,22 10:9 11:19 13:19 14:17,22 15:6 15:14 17:3,22 18:5,13 19:14 20:11,19 21:2 21:21,24 23:6 23:22 24:3 25:3,11 26:23 27:1 28:1,13 28:21 29:2,5,8 29:12,23,25 30:12 31:10,14 31:21 32:23 33:11 34:17,22 35:9,20,22 36:25 37:1,6,9 38:7,24 39:9 39:22 40:2 41:21,25 42:4 43:2 44:1,18 44:24 45:13,20 46:1,1,18 47:9 47:12 48:17 49:1,7,14 50:1 51:21 52:17 53:11,14,25 54:7 55:6,13 55:17 56:16,22 57:3,7 58:24 59:12,17,24 60:3 61:4,9,22 62:2,11,20,25 64:8,15 65:14 65:21 66:24 67:4,8,8 68:8,8 68:14 69:4,8 69:20 70:1 71:2 73:10,23 74:8,25 76:12 76:25 77:22 79:3 80:1 81:4 82:24 84:7,21 86:18 87:5,14 88:9 93:8 94:23,23,25 95:20 96:9,21 98:15,23 99:18 99:25 101:10 102:23 104:10 104:10,19,24 105:11 106:14 108:9,13 109:16 111:5,9 111:18,24 112:6,13,15 113:1,8,12,25 115:3 116:9,18 117:11 118:11 118:25 119:23 120:15 130:3,7 130:21 131:6 131:20 132:3 133:1,6 135:12 139:3,16,22 144:6 145:9 146:8,21 147:24 148:8 148:16 150:10 150:13,14,25 153:8 155:4
old 25:22
once 111:9
ones 59:14,16 87:8 127:6
open 21:18 24:13 113:3
opened 52:23
opening 95:25 99:23 100:20 100:22
operation 39:12 40:5 131:1,3
operational 112:4
opine 85:4
opinion 16:12 17:15 23:24 26:3 45:22 47:25 51:1 52:17 63:21,23 64:18,25 65:13 66:9,18,25 67:3 73:5 77:4 81:2 82:4,9 89:21 96:21 99:25 120:21 146:20
opinions 26:14 26:20 47:18 48:2,13
optics 68:1,4,22 69:1,2,5,6 70:2 70:8 71:10 72:23 73:21
option 88:7
oral 1:9,13 158:9
order 23:11,12 23:18,23 31:10 41:4 78:16 96:9,10 102:1 116:23 123:10
ordinary 10:21 11:5,7,9,11,12 11:22 13:21 14:1,3 15:3,23 16:3 17:24 41:24 42:1 43:13 59:2
origin 133:22 134:1 135:1

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 186 of 207
Adobe v. Jaffe, IPR2024-01352

136:9 138:20
original 145:10
output 56:17 56:20 57:19,25 58:10
outside 11:4,23 13:20,25 14:7 14:14,14,18,23 15:25 16:10 17:12 26:3 52:9 71:5 82:25 84:8
overcome 40:19
owner 1:7,15 2:8 4:15 158:7

p

p 2:1,1
p.m. 1:17 155:6
package 83:7 94:16 95:1,6 95:12,15,18,20 95:25 96:23 97:2,8 98:5 101:13,16,22 101:25 102:6 110:1,6,12,15
packaging 71:7 71:13 74:4,24 75:14 76:4,6 86:15 87:25 91:11 95:17 96:3 99:14 100:2,9,18
page 3:4,10 10:13 19:4,6 19:12 21:16,17 21:22 22:19 26:21,25 27:1 27:3,4 28:9 35:21 39:20 45:3,4,11,13 46:2,18,21,24 48:14,14,17,18 48:22 51:16,17 51:20 55:6,8 57:5,5,6 58:1 58:12 65:5 67:16 68:13,18 71:1,4 72:6 73:20 77:3,14 78:1,3 81:7,7 88:21 95:8,23 97:10 98:10 99:4 112:10 116:19,19,20 126:2,7 137:22 138:6,6 139:12 139:14,20 140:8,8,8 146:22 149:3 150:18 156:5
pages 71:22 159:12
paper 11:18
papers 8:24
paragraph 10:13,24 12:3 13:2,9 19:16 21:11,15,20,25 23:7,9 26:21 26:23,25 27:2 29:19 40:1,16 41:2 42:20 46:21 47:5 49:1 51:15,18 51:18,22 57:4 57:6,15,20 58:8 60:15 67:16,25 68:11 70:23 71:9 77:2,13 78:2 90:25 91:6 95:9,9,23 96:13 97:23 98:19 99:13,22 101:7 102:15 108:10,20 109:8 111:19 111:22 112:3 113:21,21 116:13 117:9 119:19 120:9 120:20 121:3,5 123:8 125:21 126:12,14 127:6,14,24 128:5,23 129:4 129:5,20 131:6 132:7 133:12 134:22 135:17 135:19 136:4 136:20 138:14 139:12,14,17 140:12,25 141:1 146:21 147:12 150:5,8 150:18
paragraphs 21:13 26:20 120:19
parameter 22:11 46:10 147:8 148:3,9 148:14,17,20 149:21 150:2
parameters 133:17
parentheses 27:20
parenthesis 27:21 38:23 39:6,6 140:1
parse 71:24
part 15:17 16:7 27:13 28:6 32:17 33:25 47:10 51:15,22 56:8 64:3 78:2 81:24 84:22 85:3 87:18 91:18 111:13 111:14 112:19 115:10 119:18

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 187 of 207
Adobe v. Jaffe, IPR2024-01352

120:8 123:4,5 125:10 130:24 131:17 132:22 133:13 134:5 138:18,19 141:1 143:18 149:12,13
partes 1:3 158:3
participating 1:18
particular 95:10
particularly 37:24
parties 158:17 158:18
parts 24:4 101:3 115:22
pass 154:24
passive 95:25
past 48:10 115:6
patent 1:1,1,6,7 1:14 2:8 3:12 3:14,15,21 4:8 4:8,15 9:3,5,7,8 10:25 11:4,23 14:1,15,18,24 15:16,22 16:9 16:11,18 18:16 19:1 21:6,25 23:10,25 26:9 27:6 28:19,22 29:14,18 30:3 30:7,13,19,25 32:15 33:2,3 33:13,24 34:4 34:19 35:2,20 35:24 36:3 44:8 45:14,15 45:15 47:6,20 48:8,8,23 49:11,11,13 51:23,23 55:11 55:19 57:11,22 59:17 60:4 64:21 65:2,4 70:25 76:23 77:12,17,21 79:3,17 80:9 106:12 107:15 107:21,25 108:7 121:12 121:14 158:1,1 158:6,7
patents 45:18 45:20,24
path 71:14,16 72:1 73:1,2,5 73:10,12,14,15 73:17 74:19 81:8 119:1 120:10 124:22
paths 72:20,21 73:6
pc 24:13
pen 19:9
pendency 6:19 6:24
pending 8:12 11:21 154:11
people 56:22 57:1
perform 16:10
performed 82:3
performing 130:22
performs 142:15
person 10:21 11:5,6,11,22 13:21 14:1,3 15:3,22 16:3 17:24 59:2 157:15 158:13
personally 157:14
perspective 91:1
petitioner 1:3 2:2 4:18 5:1 158:3
phase 153:9
phd 1:9,14 3:11 5:3 156:2 157:1,6,14 158:10 159:4
photo 79:20
photographer's 136:10
photographer's 133:23 135:2
physical 15:3 31:16,16 40:22 41:7,17,21,23 42:1,2,5,15,24 43:4,11,12,14 43:16,20,23 44:6 46:15 49:4,7,16,21 50:1,2,5,6,8,10 50:12,18,20,23 51:2,3,6,8,10 51:12 52:2,5 52:13,14,18,19 52:25 53:4,20 54:10,15,20 62:17 85:12,15 86:11 88:19 96:19,22 97:1 97:7,14,19 98:12 99:7,9 100:1 132:12 133:4,15,20 134:12,25 136:5 138:15
physically 30:20 32:24 42:18 46:16 95:22 98:16
pictorial 146:6 146:8
picture 125:9

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 188 of 207
Adobe v. Jaffe, IPR2024-01352

pieces 54:16 62:21
pints 134:21
pipeline 138:22
place 4:12 54:14 89:3 151:3
places 128:22 151:2,20
plain 11:9,12 41:24,25,25 43:12
plan 7:7
play 152:13
played 153:12
plays 152:12
please 5:10 7:5 7:10 8:11 10:12 15:18 26:16 39:10 45:3 93:1 108:11 153:5
plenty 101:11 101:23 138:24
pllc 2:9
point 39:20 43:18 51:14,14 57:4 60:2 67:25 68:6 69:8 75:2 78:1 82:16 84:12 85:17 91:10,10 92:16 95:8 102:5,25 104:12 105:6 105:15 107:11 112:10,22 132:6,6 133:11 138:13 143:24 151:3
pointed 40:8 41:20 81:1 88:3 117:10,18 119:4
pointing 36:12 37:14 48:6 72:3 73:15 74:20 116:23 119:13,15
points 104:10 104:13
pop 117:15
portion 82:2 137:21 144:7
portions 143:13
posita 23:2,20 41:12 57:11 76:22 78:5 87:4,5 89:9,11 90:13 91:1 92:15,17 102:5 105:15 108:25 122:18,21 123:18,22 124:18,22 125:11,19 126:7,22 127:17 128:7 128:24 129:13 129:25 138:25 139:23 140:19 141:10,11,25 142:8,11 143:4 146:14 152:25 153:18 154:3
posita's 75:2 107:11
positive 24:21
possibilities 104:18 105:10 105:11,15 107:14
possibly 51:24
potential 131:15,23,24 132:18
potentially 91:12 104:20
power 117:4 118:2,7 122:18 122:19,24 123:1,3,5,13,19 123:23,23 124:2,5,8,19 125:17,18,20 126:9,10 127:8 127:18,20 129:2 130:11 130:13,14,15 131:3
preceded 55:10
preceding 55:14
preclude 91:8
prefer 69:14
preferable 92:20 94:7
preferred 28:14,18 72:19
prepared 9:20
preparing 18:6
present 2:14 46:13 114:23
presented 123:10 140:5
presumably 121:23
prevent 50:4,7 50:17
preventing 51:2,5,6
prevents 40:22 49:4,21 50:8 50:23
previous 97:18 112:3 126:7
prior 22:8 40:24 42:11 52:6 53:6 74:10 87:16 89:18 93:10,24 111:19,22 132:24 133:9 144:9

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 189 of 207
Adobe v. Jaffe, IPR2024-01352

pro 101:24
probably 87:8 106:4 140:11 145:5
problem 19:10 61:15
proceeding 9:21
proceedings 4:1
process 59:22 60:7 61:5 78:16 133:21 134:1,13 135:1 135:6 136:7,9 137:3 138:16 138:19 144:12 145:25 146:6 152:1
processed 151:15,18,25 152:19
processing 57:13
processor 20:20,24 22:17 22:20,23 25:20 26:1,18 27:10 27:15 28:2,4 31:10,12 34:12 65:24 66:6,16 78:11,14,16,25 79:4,5 80:8 121:10 125:22 125:23 128:2,9 129:8,9,22 130:6 132:19
processors 25:25 26:8 30:2,6 33:22 34:3
produce 57:24 61:5
produced 1:14 61:19 129:22
produces 61:17
producing 59:3
production 133:21 134:1 134:13 135:1,6 136:7,9 137:3 138:16
promotes 56:9
prompt 115:18
proof 120:13
proprietary 60:9
prosecution 3:13 11:2 18:15 19:1 22:2 23:10,17 23:20 40:18 41:11 45:3 46:3 48:14 49:12 55:7,18 77:9 120:24 121:4
protect 116:24
protected 117:6 118:20 120:12 121:8 131:7,11 132:16 135:22
protection 133:20 134:12 134:25 136:5 138:15,19
protective 131:11,22 132:17 136:14 136:15,25 137:5 138:5,8
protocol 56:2,7 57:9,22 98:3
proved 157:14
provide 8:17 31:21,25 32:15 32:21 51:11 69:14 150:7
provided 57:24
provides 133:20 134:12 134:25 136:5 138:15
providing 120:17
public 157:22
purpose 26:8 26:18 29:13,17 30:2,6,10,18,24 31:14,18,22 32:14 33:23 36:12,19,23 37:3,17 61:18 128:4 135:13 136:1
purposes 3:17 12:4 41:13 144:15,21 157:16
put 54:13 55:17 91:12 129:19 150:6 152:10
putting 16:25

q

question 5:20 6:23 8:8 11:3 11:21 13:23 14:22 15:18 26:16 29:15 30:5,17,18,22 32:8,12 33:18 34:6,15 35:4 35:12 42:13 47:17 49:14 52:20 54:18 56:25 59:1 60:21 61:13 64:3,4,25 73:4 74:12 80:22 83:13,17 84:25 88:13,21 93:13 94:11 97:3 98:4 100:6,13

JAFFE EX. 2012, Page 190 of 207
Adobe v. Jaffe, IPR2024-01352

104:1 105:1 107:5 109:7 110:8,18,19,23 111:2,4,14 112:19 115:22 116:6 117:13 117:23 119:25 120:4 122:5 124:6 128:16 134:17 136:12 136:24 146:13 148:6,19 149:12 154:11
question's 39:25
questions 8:3,7 8:12 136:18 137:1 155:2
quickly 21:14 58:2 131:18
quite 67:5 145:12 151:2 153:20
quotations 3:23
quote 3:24 19:16 48:21 103:13 126:19 127:2 128:23 129:10
quoted 29:7 118:14 126:18 126:21 127:5 127:14,15,23 129:12
quotes 48:20
quoting 116:22 120:16

r

r 2:1
ram 117:3 118:7 119:3,4 119:15 121:11 122:1 125:6,22 125:23 128:3 128:10 129:9 129:22 130:6 131:2
rather 8:3
reaching 47:15 47:18 48:2,13
read 3:23 22:15 39:1 40:3,17 63:13 73:19 81:7 96:12 97:9 98:18 99:12 106:12 109:3 112:2 113:9,14,19 120:3,5 126:11 126:20 127:16 134:23 143:4 146:13 150:13 151:11 157:1 159:6,8
reading 47:24 52:12,19 95:3 127:17 142:8 142:11 153:19 154:3
ready 106:14
real 145:9
really 17:6 32:9 91:9 145:3
reason 8:16 156:5
reasoning 122:2
reasons 81:11 120:18
recall 18:9 33:4 34:21 48:15 128:22
receive 115:12
received 25:24 116:25 152:1 152:20
receiver 145:14
recess 10:8 44:23 106:19 139:7
recheck 115:3
recite 123:7
recites 12:21
record 3:24 4:3 4:11 5:10 7:6 10:4,7,10 40:25 44:22,25 63:10 67:10,12 106:15,16,18 106:20 113:25 123:16 139:6,8 155:5 158:15
recorded 52:24 53:5
recorder 27:11 27:20 38:17,20 38:23 39:7,15 39:19 40:7,14 40:17 78:18 79:5
recording 3:17 27:22 51:25 52:1,4,13,17 53:21 54:3 56:19 108:13
recordings 61:25
recordkeeping 115:2
reduced 158:14
refer 9:7 21:7 26:21 40:15 63:8 82:14 147:1 150:16
reference 6:13 22:24 67:19 70:8 72:1,6 77:11 105:24 106:8 107:17 108:4 138:5,7 138:13 142:4 152:15
referenced 159:5

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 191 of 207
Adobe v. Jaffe, IPR2024-01352

references 40:24 45:21 55:25 82:19 107:23,25 108:3 147:13
referred 57:17 82:5,24 118:23 142:21,25
referring 9:14 18:2 27:8,9 37:12 60:6 67:18 117:19 141:23 147:5 147:20
refers 45:14 68:23 143:10
reflected 3:23
regarding 6:21 7:1 21:3 46:20 47:15,18,19 48:21
regardless 57:16 142:19
registration 158:24
rejection 40:20
related 3:17 23:12,18 158:17
relates 9:3 148:2
relating 116:14
relation 17:10 146:24
relative 4:6 158:18
relatively 130:12
relevant 36:10 87:11
relied 21:3
reloaded 98:3
relying 148:10 150:2
remaining 40:15
remember 33:5 33:6 34:17,21
remote 47:7
remotely 1:19 2:2 5:13,15,23 5:25
removable 27:22 125:9
render 94:17 95:13
repeat 4:24 5:20 6:23 13:23 14:22 15:18 29:15 30:5,22 32:11 33:18 34:1 35:4 42:13 47:17 49:14 54:18 56:24 59:1 60:21 64:3 70:11 73:4 74:12 83:17 84:25 88:12 89:4 90:18 98:8 100:6,19 105:1 107:6 110:23 115:10,23 117:13,23 121:22 123:4,5 124:6 128:21 140:10 148:6 148:19 150:11
repeating 26:16 43:9 97:4 119:24
repeats 13:13
report 10:24 13:9 16:1,6 17:12 21:8 26:4 48:6 51:13 52:9 64:17,21 65:13 66:11 68:12,17 70:23,24 72:5 72:25 73:9 74:18 78:1,23 81:7,24 82:8 82:12 83:9 113:20 116:17 139:12 149:3
reporter 1:18 4:12,20 5:5,17 8:3 24:24 25:3 32:7,11 38:25 44:10,15 120:3 137:24
reporter's 3:7 3:23 158:9
represent 138:4
representative 4:19 5:2
reproduced 139:18,19
requested 120:5
require 42:16 63:1 96:25 97:6
required 59:21 106:12 117:4 117:16,20,24 118:1,10,12 122:4,16,22 124:1 125:20 125:24 126:8 126:16,19,21 127:2,5,9,10,24 128:10,12,14 128:15,25 129:10,23 130:1,17
requirement 86:21
requires 12:23 30:14 46:14 130:19
research 16:21 16:23 17:5,11

JAFFE EX. 2012, Page 192 of 207
Adobe v. Jaffe, IPR2024-01352

researching 17:14
resist 95:6
resistant 71:7 71:13 74:4,24 75:14 76:4 83:6 86:15 87:25 91:11 94:16 95:1,6 95:11,16,20,24 96:10,23 97:2 97:8 100:2,8 100:18 101:15 101:25
respect 16:17 82:14
responsive 71:7 71:13 74:4,24 86:15 87:25 91:11
restate 93:12
restroom 137:25
result 141:5 142:12
resulting 58:10
retire 126:18
return 96:6 159:12
review 1:3 36:9 47:23 48:5,11 48:12 107:15 107:21 108:7 137:19 138:12 158:3
reviewed 23:10 45:17 109:3
reviewing 48:15
ribbon 25:11 32:3
rieger 3:18 116:22 117:22 117:25 119:20 119:22 120:9 120:16,21 121:2,6,8,14,14 121:18 122:14 123:7 127:15 127:16,19,25 128:23,25 129:11 132:7 132:10,15,23 133:3,19 134:24 136:4 137:10,13,20 137:23 138:13 138:14 140:4,7 140:14,21,22 140:25 141:18 141:22 142:3 142:17 143:1 146:16 147:13 147:21 148:1,1 148:13 149:9 149:14,25
rieger's 139:24 140:20
rieger's 120:13
right 7:17 10:3 12:19,25 13:5 13:12 14:7 17:7 18:2,25 21:11 24:4,11 24:20 26:12 27:2,24,25 28:2,3,8,24 33:15 34:10,24 35:3,7 37:18 37:22 38:6,11 40:9,10 43:3,6 43:21 44:9 45:23 50:8,9 50:21,23 51:7 53:3,12 55:3,4 55:17 62:15 63:3,6,9 66:16 68:6,11,16,20 68:21 69:23 71:6,23 72:2 73:20,20,21,23 76:5,16,17 77:12 78:3,7,8 78:10,19,24 79:8,18,20 81:6,13 82:9 83:16 84:6,9 84:19 85:5,24 85:25 86:2,9 88:2,4,23 89:13 90:4,23 91:14 92:13 100:15,23 102:8,13 103:2 103:19 106:1 106:17 107:19 107:22 108:2,6 108:9,19 109:1 109:18 113:10 113:18 114:7 116:12 118:4,6 118:9,15,19,22 119:5,6,12,14 120:16,17 121:5,16 122:17,18 127:3,13,14 128:19,22 129:7 131:16 131:25 133:25 134:9 135:10 135:20 136:3 136:18 139:1 139:11,13 142:1,9 143:4 144:21 145:7 145:16 146:1,3 146:10 147:16 149:16,16 150:15 151:10 151:17,24 154:1,1,24
room 6:9,11,14 6:17 7:9,11 50:23

JAFFE EX. 2012, Page 193 of 207
Adobe v. Jaffe, IPR2024-01352

roughly 20:10
round 86:19,19
rows 89:5
rules 159:14
ruling 41:13

s

s 2:1 3:9
san 2:5 5:16 6:1 6:7
saying 29:24 53:8 60:22 79:25 90:1,24 92:5 103:25 104:4,8,9 107:24 110:4,5 127:9 128:18 144:11 145:2 147:19
says 10:25 12:3 13:2,4 19:17 19:21 20:20 21:25 22:7,15 24:4 27:20 28:8 36:19,24 38:14,22,23 39:4,6,12 40:4 40:12 41:2 43:19 46:12 47:6 49:2,20 50:4 56:5 57:8 57:15 60:6,18 62:2,3,14 68:3 68:9,15,15 69:5,14 71:9 72:19,23 75:1 77:4,13,14 81:8 82:22 86:2,5 101:13 103:1,4,7 104:16 108:24 108:25 112:3 113:19,21 116:23 118:18 133:14 135:21 135:21 138:20 140:15 141:1,7 151:8
scenario 52:15 52:22 53:1 64:1,16 111:7 121:13 123:18
scenarios 115:15
scene 54:3 72:23
schipper 45:14
school 20:14,15
scope 11:25 12:1 14:8 15:24,25 16:11 17:12 26:3 52:9
screen 9:16 115:18
seal 157:18 158:20
sealed 110:12
sec 9:12
second 10:16 27:21 35:21 47:4 49:2 55:18 57:15 58:12,13 71:8 95:9 99:12 101:12 104:13 104:15 105:7 108:24 109:4 129:3,24 135:20,21 139:24 140:11 140:19 141:1 141:13
secret 117:3 131:15,24 132:20 136:22 137:8
secretly 8:21
section 120:12 121:9
secure 59:10,15 131:10 132:16 132:17 133:2,7 133:8,15 135:23 136:2
security 39:13 40:5,12
see 6:12 9:18 10:19 19:14,14 19:16,19,24 20:25 21:7 24:14 27:7,18 35:9 36:19,21 37:2,5 38:18 39:12,16 43:2 45:13,16 46:5 46:11,11,12,17 46:24 47:1,6,8 48:20,20,25 49:1,6,24,25 55:25 58:13,18 59:20,23 62:6 65:1,7,7,8,23 66:3,4,5 71:4 72:16 74:25 78:8 79:20 81:14,15,18,19 81:21 82:20,21 83:2 84:3 85:23 86:3,4 86:20 94:14,19 101:6 102:10 106:8,8 107:15 108:9 110:3,3 111:22 117:8 117:16,18 119:10 120:6 125:10,25 126:3 131:8 132:9 134:6 139:16,21 140:1,3 141:3 143:19,20 145:22 149:2 150:4,5 151:16

JAFFE EX. 2012, Page 194 of 207
Adobe v. Jaffe, IPR2024-01352

154:1,9
seeing 144:22
seem 104:4 128:17
seen 32:23 45:7
sees 110:11
self 128:14
send 88:6 90:2
sender 145:14
sense 90:5
sensor 12:5,6 12:16,22,23,23 13:3,6,10 14:2 14:9 15:14,20 16:5,8,13 22:9 23:3,4,13,14 28:9,12,14,15 28:18,23,23 29:8,20 30:14 38:17 39:14,19 40:7,13,23 41:6,8,16,18,22 42:9,18,23 43:1,17 46:7,9 46:15 49:5,9 49:17,22 54:23 63:15 66:12,15 68:2,5 69:1,3,6 69:7 71:15,16 71:19 76:17 77:5,19 78:4 78:10 81:9 88:23 93:9 95:11 96:18,20 96:25 97:6,13 97:15,17,20,22 98:7,11,14,21 98:25 99:2,6,8 100:5,10 101:5 116:25 117:2 119:1,9,10,11 119:13 120:10 120:22 121:9 121:10,15,23 122:1 124:10 124:21 125:6 125:22,23 128:2,9 129:7 129:21 130:6 130:25 132:12 132:14 133:17 133:22 134:1,4 135:2 136:9 138:17,20
sensors 14:13 14:13 47:6
sensory 49:8
sent 46:11 85:25 86:2,5 86:12 88:4 89:7,10,13,16 89:23,24 90:1 90:6
sentence 10:16 10:25 20:25 21:2,25 22:3,5 22:15 38:14 40:3 41:9,19 46:11,17,19 47:2,8 49:2,6 49:20,25 50:16 50:16,16 56:5 57:15 59:20 62:2 63:13,13 68:3 69:20 70:1,11 71:9 71:25 73:19 74:18 81:8 89:12 90:3 97:9,10,18 98:9,9,19 99:3 99:13,22 101:13 102:4 102:10 103:4,7 103:12 104:16 107:8 108:23 108:24 109:4 112:3 116:23 118:13,19 126:11,20 127:15,16,17 128:13,24 129:3,4,20,20 129:21,25 131:9,12 134:22,23 135:23 138:14 138:20,25 140:10 141:17 141:17 142:1,6 142:8 143:4 146:13 147:12 149:1 150:11 153:19
sentences 40:16 113:9
separate 6:14 31:6 68:16 82:22 149:10 152:2,3,4,6,7
sequentially 123:13
serret 3:21 150:16,18,19 150:21,25 151:3 152:17 152:23 153:15 153:24
set 10:5 28:15 28:23 29:8 38:17 39:14,19 40:7,14,23 49:5,8,9,17,22 66:15 140:19 154:19
setting 94:6
sever 137:4
severed 131:14 131:23 132:18 133:3 135:15 135:24 136:2 136:20 138:9
sha 59:11,15
shaped 118:22
share 9:11,17 9:19 18:14,15

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 195 of 207
Adobe v. Jaffe, IPR2024-01352

sharing 9:17
sheet 159:10
shield 131:11 131:13,22 132:3,17 134:8 135:7,14,22 136:1,14,15 137:5,16,22 138:5,8
short 24:18 25:8 61:1 91:21,23,25 93:21 107:19 109:20 122:7 124:17
shorthand 1:18
show 27:19 77:19 109:10
showed 125:18
showing 22:17
shown 19:22 29:3 35:6 58:11 72:20,21 79:7 112:11 127:18
shows 9:18 10:1 71:10 73:20 121:8,14 125:21,22 129:21
sic 32:21 33:12 46:24 78:2 107:8
side 58:23 81:14 119:5,10 119:14
sign 105:14 159:6,11
signa2 59:22,24 60:5,7,8,13,14 60:17,22,25 61:2,4,7,17
signal 40:21 49:3,20 56:2 72:21 96:5 139:25 140:21 140:21,23
signaled 79:21
signature 3:6 56:6,7 57:8,9 57:22 59:21 60:13,16,19,22 60:25 62:4,11 62:14,16,18,21 63:8,14 117:1 117:3 131:25 132:21,25 133:23 135:3 136:10 141:13 156:1 157:2 158:22
signatures 58:25 59:4,7 140:19 141:20 141:21 146:15
signed 159:17
similar 78:7 80:22 83:21 96:7 121:20 142:16
simple 20:13 25:21 101:1
simplest 122:9
simultaneously 66:14
single 58:9 92:3 92:16 124:15 124:23 152:10
sir 4:23
sit 55:3
sitting 17:15 18:9 26:11 51:10 53:3,12 83:1 85:5 106:1 107:19 107:22 108:2,6
situation 50:25 121:21
size 57:17
skill 10:21 11:5 11:7,12,22 13:21 14:1,3 15:4,23 16:3 17:24 59:2
skip 22:3 133:12
slightly 58:17
slot 25:22,24
slow 25:5
small 58:14,14 70:15 74:5,25 75:15,15,23 76:2,7,8,11 86:14,22 88:1 88:7 90:7,12 91:13 92:1,6 121:24
smaller 90:16
smiley 144:8
smiling 140:18 141:4,8,12,14 141:19,20,23 142:5,10,18,24 143:7 144:19 144:23 145:8 146:17
software 98:1,3
solid 72:21 90:7
solution 88:8 90:8,10,13 91:15 92:21 94:11 122:10
solutions 158:24 159:19
somewhat 5:25
sorry 5:17 7:15 15:17,19 18:13 24:24,24 25:2 30:5,22 32:8 32:10,10 33:16 35:4 38:25 39:3 42:10

JAFFE EX. 2012, Page 196 of 207
Adobe v. Jaffe, IPR2024-01352

44:10,15 45:4 46:7 47:13,21 51:17,19 56:24 60:21,23 65:2 66:1 70:24 72:3 73:4 83:17,23 84:25 85:14 88:12 90:18 94:20 105:1 106:24 109:14 110:23 111:6 112:24 116:15,15 117:14,23 124:6 125:2 131:17 142:24 143:17 147:2 148:19

sort 24:20 71:5 115:14

sounds 139:4 149:21

space 70:16 74:5 75:15,20 75:23 76:2 86:14,21 88:1 88:7 90:8,12 91:13

speak 7:4

speaking 66:14

spec 36:6,10,14 69:5 90:4

special 98:3

specially 117:5 118:20 131:7

specific 16:20 75:6 88:15,15 93:18 108:4 109:11 128:1 129:6 137:21 141:6

specifically 60:8 74:21 78:23 88:10 89:1 98:6,15 99:1 100:3,11 108:21 110:21 110:25 117:19 137:14 151:8 151:25 152:24 153:14

specification 40:4 41:10 51:23

specifics 36:4

specs 69:18 102:19

speed 24:25

spend 83:2 85:18 107:14 107:20 153:2

spending 26:5

spent 17:13

stage 133:21,25 134:3,13,14 135:1,5,5,10 136:6,8 137:3 138:16

stand 10:6 67:9 149:23 155:4

standard 146:25 147:6 148:18

standards 60:11 148:13 149:25

star 58:3,14,15 58:15,16

start 21:16,24 57:6 68:9,10 70:22 112:10 151:4

started 9:10 24:5 70:12 71:3 108:23

starting 20:19 62:3 97:23 109:4

starts 19:18 23:9 47:2 116:19 120:20 150:18

state 4:10 5:9 96:6 97:24 140:4 154:13 157:12,22 158:12

stated 13:9 17:2 21:14 22:13,16 41:12 44:9,11,12 97:18 99:3 158:12

statement 17:1 23:19 70:7 89:21

statements 41:11

states 1:1 4:7 51:23,23 95:24 109:10 132:15 133:19 134:24 136:5 138:15 158:1

static 152:11

stating 101:24

stay 12:2

step 22:9 40:19 48:21

steps 19:21 20:2

stop 71:23 73:23 96:8 151:22

storage 69:17 69:25 79:2

store 68:23 69:9,10,11,15 69:16,18,21,24 70:2,9 71:10 73:16,22 74:3 75:8 76:16 77:25 78:9,12 78:15,22 79:13 83:16,22 84:2

JAFFE EX. 2012, Page 197 of 207
Adobe v. Jaffe, IPR2024-01352

85:9 86:1 88:5 88:23 89:7,14 90:6 93:9,16 93:23 100:4,11 101:5
stored 44:13 132:20 152:2,7
story 149:10
straightforward 143:12
stream 44:13 56:10,20
street 2:4,10
strike 96:23 103:22 125:3
structure 19:18 19:21 20:2
studying 17:14
styled 1:15 4:6
subject 6:21 7:2 19:23 40:25
subjective 145:2
submitting 48:16
subscribed 157:15
suffices 92:16 116:11
suggest 22:9
suite 2:5,10
summarize 21:14 41:9
supervision 158:15
supplied 127:21
supply 20:22 22:21 118:2,8 122:18,19,24 123:1,3,5,13,23 123:23 124:5,8 127:8 129:1,3 130:13,15
support 70:6 111:8 149:20 149:22
supported 77:8 120:24
suppose 114:21
sure 5:11 7:12 7:12 8:15,15 8:23 9:9 13:17 13:24 83:2 106:11 123:25 147:18
surface 76:2 80:16
surrounding 46:19,20
switch 96:4,5 99:16,19,21,21 99:25 100:15 100:16,17,21 100:23 102:2,8 102:12,22 103:6,9,20,21 103:24 104:4,5 104:5,11,14,21 105:9,17,18,20
sworn 1:15 5:4 158:13
sys 112:7
system 68:16 68:20,25 70:5 70:13,15 71:6 71:12,18 72:20 73:2 75:14 77:19 81:11 82:22 92:23 94:17 95:10,13 95:15 98:1,2 98:20 101:14 111:15,20 112:5,8,17,22 113:3,16,22 114:12 115:20 116:1 117:1 133:3,14 142:17
system's 114:14,19 115:13
systems 2:15 31:2

t

t 3:9
tab 10:2
take 8:11,13 44:19 56:16 67:7 75:20 104:23 105:20 106:4,6 137:20 137:25 139:2
taken 1:15 10:8 44:23 67:11 106:19 139:7 158:17
talk 31:10 70:21 72:9 82:10 119:20 122:22 131:6 131:13 151:19 152:20,23
talked 14:11 22:14 28:7 63:4 75:25 78:13 84:4,14 91:24 121:21 122:15,16 139:17
talking 14:19 21:10 24:10,16 28:11 30:8 33:1,2,2 37:23 42:21 48:10 50:18 60:1 63:13 66:2 70:14 73:13 75:22 76:3 80:5 83:24,25 84:13 86:7,25 88:1,25 91:19 91:20 92:2

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 198 of 207
Adobe v. Jaffe, IPR2024-01352

93:5 94:20 107:1 108:21 109:1,18 115:6 117:11 121:3 122:23 127:1 127:25 129:2 137:22 138:21 142:2,2 144:17 144:20 146:17 148:23 149:10 149:24
talks 62:25 63:7 71:25 94:16 109:5 131:10
tamper 71:7,13 74:4,24 75:14 76:4 83:6 86:15 87:25 91:11 94:16 95:1,6,11,16,20 95:24 96:10,23 97:2,8 100:2,8 100:18 101:15 101:25
tampering 102:3
tcb 24:11
teach 22:8
teaches 97:24
technical 18:7
technology 14:25 15:2,8
telephone 143:15,17,18 143:19,23 158:25
tell 103:14 145:12,20
ten 106:7 139:3
tentative 23:11 23:12,18,21,22 41:3,13
tenth 7:22
term 10:17,17 10:22 11:1,13 21:4,4 22:1 23:3,21 41:12 71:21
terminology 127:25
terms 14:9 16:7 25:21 63:21 91:6 109:7 135:4,5 136:22 137:1,2 142:17 146:18
test 139:25 140:20
testified 5:6 37:15
testify 158:13
testimony 8:17 42:12 44:17 52:7 53:7 74:11 87:17 89:19 93:11,17 93:21,25 133:10 144:10 158:15 159:8
texas 1:17 2:11 158:12,23
text 46:20 56:19 141:22 142:3,22,25 151:7
thank 18:23,23 19:7 120:6,6 155:1
theatre 153:21
theatres 153:20
thick 92:17 93:19 122:7
thicker 124:15 124:20 127:20 130:18,19
thin 24:14
thing 5:21 14:17,23 15:3 15:3 62:17 79:24 92:6 137:19 145:13 145:21
things 12:10,11 12:18 38:9 73:25 100:13 118:3 122:25 123:6 143:10 149:22
think 6:10 7:3 15:9 16:3 18:23 26:2 37:25 47:24 53:13,16 54:1 54:12,14 59:13 64:9 71:21 79:9 80:14 85:19 86:18 90:13,14,14 93:4 102:23 104:5 106:4 107:5,10 111:13 113:14 115:22,23 118:24,24 119:2,8 137:21 137:21 138:25 139:18 145:23 147:17 150:13 154:3
thinking 53:19 53:22
third 18:15 43:19 104:16
thought 17:6 43:9 54:16 149:20
three 127:4 128:2 130:5
thumb 15:12
tif 152:16
tight 11:1 16:7 17:19,20,21 18:2 22:1 28:11 39:14,18

JAFFE EX. 2012, Page 199 of 207
Adobe v. Jaffe, IPR2024-01352

40:6,13 41:5
41:15 42:22
46:14 49:18
62:25 63:4,7
63:14,15 96:17
97:12,21 98:11
98:20 99:5
132:11
tightly 10:17
10:23 11:6,13
11:24 12:5,18
12:22,24 13:3
13:19,20 14:2
14:4 17:4,10
17:16,23 18:4
18:6 20:20
21:4 22:10,18
22:20 23:2,3
23:13,25 28:4
28:10 30:15
38:16 46:9
59:20 62:4,22
62:23 71:20
77:5 120:22
121:15
time 4:4,10
17:13 26:5,9
29:13,17 30:3
30:7,13,19,24
31:18 32:15
33:3,13,23
34:4,18 53:15
53:23,25 54:5
54:12 67:7
76:10,22 83:2
85:18 86:25
87:6,10,15
90:21 91:4
105:25 106:4
107:10,14,20
107:20 108:7
112:16,22
113:3 114:25
135:4 137:2,18
138:2,12
151:21 153:11
155:3 159:15
timeframe
159:7
times 7:20
97:25 108:5
135:3 136:8,12
timing 115:4
titled 3:16
today 5:1,13,23
6:9,25 7:24 8:7
8:18,25 17:15
18:9 26:12
today's 4:4
together 6:1
12:12 71:11
73:22 123:14
tolerate 124:16
tom 2:15 5:2
6:10
took 7:23
top 17:7 20:3
50:15 51:9
52:9 54:11
59:13 61:23
64:9 82:9 83:1
84:19 106:1
119:11 139:19
144:20,21
145:6,6
toward 120:8
towards 140:11
trace 20:23
22:23,24 24:3
24:5,9,11,12,15
31:22,25 32:16
32:21 33:9
34:14 63:25
65:11,19,25
66:19 67:2
73:3,6,11,18
74:16 75:10,12
75:18,25 76:19
76:24 77:8
81:5 83:7 84:7
86:17 88:8
90:9 91:16
92:22 94:12
122:1,11
124:24 130:23
tracers 71:18
traces 12:7
13:10 23:5,15
29:6,9,21
31:13,20 33:12
33:15,24 34:5
34:9 46:20
63:2,9,18,23
64:19,23 66:22
70:4,10,18,21
72:11,18 73:7
74:7,9,22
80:21 81:10
89:17,25
119:17,21
120:12,24
121:19 126:24
127:12 128:8
128:19 129:15
129:18 130:2,4
130:9 131:5
trademark 1:1
4:8 158:1
transaction
112:4
transcript
159:5,16
transcription
158:15
transmission
88:2 91:15
129:15,17
130:11,22
131:2 144:1
transmit
126:25
transmitted
42:17 96:15
transmitting
128:6

JAFFE EX. 2012, Page 200 of 207
Adobe v. Jaffe, IPR2024-01352

trial 1:1 4:8 158:1
trigger 102:2,6 137:6
triggered 100:1 100:17 132:19 137:16 138:8
triggering 100:7 137:7,8
triggers 100:8 100:23
true 157:3 158:12,15
truth 158:13
truthful 8:17
try 9:17
trying 43:22 104:2 110:7 113:15 131:19 149:18,18,20 149:22
turn 19:6 35:20 35:21 36:25 38:11 39:9,10 46:2 48:17 55:6,19,22 59:17,19 65:1 65:21 70:24 108:10,10 146:21
turning 10:12 18:13 45:2 67:15 116:12 116:13 139:11 150:15
two 12:10,11 12:18 22:24 24:4,20 45:17 45:24 47:2 58:3,6,17,19,20 58:21,22 64:12 70:16 71:22 73:1 75:3,16 75:24 83:25 86:7,14 88:1,6 100:12 101:2 104:10,13 111:13 115:22 125:8,10,12 127:22 128:22 145:1,6 146:15 146:18 147:13 148:13 149:25
tx 159:13
tx7370097 157:25
type 34:17 57:17,23
typical 33:21 34:11 90:17,20
typically 30:3 31:15 92:7 151:15

u

u.s. 1:6 158:6
ultimate 96:1 99:24 100:21
under 4:13 7:24 12:9,13 12:20 27:20,21 38:22 39:5 64:10 84:10 104:3 145:13 145:14 146:18 157:14,18 158:15,20
underneath 38:9 142:1,9 145:18
understand 5:18 7:24 8:2,6 8:7 9:2 11:7,22 12:5 14:3 15:4 16:4 20:9 23:2 24:25 25:1 29:23 30:16 34:6 41:14 43:23 48:11 61:13,16 64:2 88:21 104:1 107:12 108:25 110:3 112:7 113:15 120:15 122:21 126:23 128:7,15,17 129:25 134:6 135:25 147:18
understanding 10:22 17:9 20:1,4 29:24 36:7,22 43:4 49:15 55:9 79:23 126:4
undertaken 115:20
unique 22:11 46:10 147:7 148:3,9
unit 27:18 38:8 39:5 68:21,22 70:12 74:24 76:7,8 78:19 79:15,16 80:17 81:1,18 85:25 91:14 125:19 130:14
united 1:1 4:7 158:1
units 80:6 86:7 86:14 88:6
unquote 127:2
unwelcome 94:17 95:2,7 95:12,21
upper 82:1
use 18:21 56:22 57:1 75:24 87:3 88:8 90:8 91:15,17 92:17 92:22 94:11 122:10,11 129:10 145:24 145:24
used 34:3,18 56:7 57:13

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 201 of 207
Adobe v. Jaffe, IPR2024-01352

59:10,16 77:6 78:6 87:8 92:10 94:17 95:12 107:9 126:8 129:17 159:16
useful 57:21
useless 94:18 95:13
user 20:21 22:21 46:16 109:3,11,12,15 109:16,18,19 109:21,22,24 110:5,8,11,14 111:2,10 112:15,17,21 112:25 113:2,3 113:4 114:3,10 114:12,14,19 115:2,8,9,12,19 115:25 140:5 140:16 141:2,7 141:9 142:7,14 142:19 143:4 143:14,16,21 143:24 144:4,8 144:13,22,24 145:3,9,16 146:3,9
uses 80:19 129:11 152:22
using 57:9 77:7 83:14,14,15,20 92:12 98:3 114:21 126:23 127:1,10,11,25 129:15 130:2,3 130:4,8 131:4 153:11 154:22
usually 31:2 124:15 130:17
utilize 96:3 99:15 103:4
utilizing 22:9 46:6,8 77:5 120:21

v

v 159:3
vague 33:17 44:2 61:11 144:25 147:10 148:4
value 57:16,19 57:25 58:5,10
values 58:7,19 58:22
verbal 8:3
verifiable 38:15
verify 159:8
veritext 9:11 10:2 158:24 159:12,19
veritext.com. 159:13
version 145:10
versus 4:6 58:16 130:12
viable 88:7,7 91:15 92:21 121:25
video 56:19 61:25 151:7,9 151:17 152:8,9 152:10,11,12 152:14 153:10 154:20
videoconfere... 1:10
videographer 2:17 4:3 10:6,9 44:21,24 67:9 67:12 106:14 106:17,20 139:5,8 155:4
videotaped 1:9 1:13 158:9
view 17:1 75:3 92:16 102:5 105:15 107:11
viewing 115:8 115:11 144:15 144:21
violation 136:14,15
virtually 20:21 22:21
visually 145:3
vs 1:4 158:4

w

w 2:10
wadded 32:5
wait 51:19
want 13:24 24:7,19 36:15 38:5 54:11 59:8 75:6 82:1 84:12 103:12 106:6,10 147:18,24 154:16
wanted 17:22 67:7 147:17
warning 105:14
waste 92:10,14 92:14
way 5:20 21:14 34:11 54:13 57:12,18,21 58:20 74:5 75:3,16,23 76:18,23 78:3 79:19,22 86:15 90:2,11 100:24 114:25 115:1 121:25 141:2 142:16 143:4 143:12 148:8 150:6

JAFFE EX. 2012, Page 202 of 207
Adobe v. Jaffe, IPR2024-01352

ways 103:2,6 114:17,18
we've 44:18 106:4
went 51:17 80:22 81:6 106:25 118:6 131:17
white 58:14,14 119:7 125:8
winston 2:3 4:25 5:16 6:2
wire 24:12 33:9 75:4,25 77:7 92:3,8,11,16,17 122:12 124:15 124:25
wires 24:18,21 25:8,9 75:19 92:3,4,8,10
withdraw 30:1
witness 1:14,18 3:4 4:12,18 5:1 5:19 11:14 12:2 15:25 25:2,5 33:18 39:3 42:13 44:12 48:4 52:8 53:8,18 61:12 63:12 67:8 74:12 86:24 87:18 88:12 89:20 93:1,12 94:1 94:10 98:18 99:12 106:10 106:22 113:7 119:23 120:6 123:17 133:11 134:11 135:9 140:24 143:3 144:11 145:1 147:11 148:5 153:6,18 154:17,25 155:1 158:16 159:5,7,9,11,15
wliaw 2:6 159:1
word 11:6 12:8 13:13,14 16:14 16:24 17:9,16 20:4,6,10,11 69:17,18 87:3 89:10,10,23,24 143:9 153:24 153:25
words 11:6,7 11:24 16:5 17:3,23 18:5 20:1 23:25 72:17 76:16 107:8,9 145:6
work 16:15,16 16:19,20,21
works 61:23
world 14:14,18
wright 2:9 4:15
writes 78:25 112:13 113:17 113:17,20
writing 113:24 115:20 116:1,3 116:10 158:14
written 70:20 112:16 114:24
wrong 128:20
wrote 90:25

x

x 3:2,9 5:12
xiong 1:9,13 3:4,11 4:5 5:3 5:9,12 10:12 45:2 53:19 67:15 106:25 138:4 139:11 156:2 157:1,6 157:14 158:10 159:4

y

y'all 106:14
yeah 4:22 11:10,10,16 14:5,15 17:19 17:20,20 18:20 18:21 19:3 21:9,20 24:7 24:10 25:5 26:24 27:17 30:22 33:3 36:16,18 38:5 38:5 40:15 43:12,19 44:18 48:19 49:25 51:20,22 52:8 53:22 55:8 59:9 60:17 65:4,4 66:8,9,9 72:12,14,16 82:17 83:12,23 87:18 89:6 94:1 101:2,9 101:20 106:3 106:16 109:19 109:23 113:13 115:23 116:3 116:10 118:5 118:13,24 119:4,18 120:15 123:17 125:14 126:3 126:18 132:9 133:12 134:21 135:9 137:11 137:19,20,20 138:1,1 139:4 139:14 140:3 143:20 145:23 148:5 150:13 151:20 154:17
year 33:2 57:11 76:10,22 87:7 87:13,20,21 91:1,5

JAFFE EX. 2012, Page 203 of 207
Adobe v. Jaffe, IPR2024-01352

years 33:5,7
34:21

z

zigzag 66:7
zixiang 1:9,13
3:4,11 4:5 5:3
5:12 156:2
157:1,6,14
158:10 159:4
zoom 1:10 5:13
5:23 6:13 32:9

Veritext Legal Solutions
800-336-4000
JAFFE EX. 2012, Page 204 of 207
Adobe v. Jaffe, IPR2024-01352

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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