

PUBLIC VERSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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

TABLEAU SOFTWARE, LLC,	)	
	)	
Petitioner,	)	
	)	
VS.	)	Case IPR2024-01387
	)	Patent No. 8,271,892
ICHARTS, LLC,	)	
	)	
Patent Owner.	)	
_____	)	

-- C O N F I D E N T I A L --

IN-PERSON DEPOSITION OF
SEYMOUR DUNCKER
FRIDAY, OCTOBER 10, 2025

STENOGRAPHIC REPORTER: CHRISTA YAN, CSR NO. 14316, RPR

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

2

PERSONAL APPEARANCES:

FOR PETITIONER:

STERNE, KESSLER, GOLDSTEIN & FOX
BY: STEVEN PAPPAS, ATTORNEY-AT-LAW
TYLER DUTTON, ATTORNEY-AT-LAW
1101 K Street NW
Washington, DC 20005
(202) 371-2600
tdutton@sternekeessler.com

FOR PATENT OWNER:

WOMBLE BOND DICKINSON
BY: LESTER VINCENT, ATTORNEY-AT-LAW
FABIO MARINO, ATTORNEY-AT-LAW
1279 Oakmead Parkway
Sunnyvale, California 94085
lester.vincent@wbd-us.com

ALSO PRESENT PERSONALLY:
NISHA AGARWAL

— — ○ ○ — —

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

3

1	INDEX OF EXAMINATIONS	
2		PAGE
3	BY MR. DUTTON	5
4	BY MR. MARINO	96
5	BY MR. DUTTON	100

--oOo--

10	Witness's Changes or Corrections	104
11	Reporter's Certificate	105

--oOo--

E X H I B I T S

19	EXHIBIT	MARKED FOR IDENTIFICATION	PAGE
20	No Exhibits Marked.		

--oOo--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

4

1 BE IT REMEMBERED that on FRIDAY, the 10TH DAY OF
2 OCTOBER, 2025, at the hour of 9:34 A.M., of said day, at
3 1279 Oakmead Parkway, Sunnyvale, California 94085, before
4 me personally, CHRISTA YAN, a Certified Shorthand
5 Reporter, State of California, personally appeared SEYMOUR
6 DUNCKER, who was examined as a witness in said cause; that
7 said transcript format was prepared in accordance with
8 California Code of Regulations Section 2473.

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

--oOo--

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

5

1 SEYMOUR DUNCKER,
2 the Witness, called on behalf of the Petitioner, being
3 duly sworn to state the truth, the whole truth, and
4 nothing but the truth, testified on oath as follows:

5 EXAMINATION

6 BY MR. DUTTON:

7 Q Good morning, Mr. Duncker. Before we get
8 started, my name is Tyler Dutton, here on behalf of
9 Tableau Software, LLC, from the law firm Sterne, Kessler,
10 Goldstein & Fox. With me today is Steve Pappas from the
11 same law firm.

12 Counsel can appearance on the record --

13 MR. MARINO: Sure.

14 Fabio Marino, with Womble Bond Dickinson. With
15 me here are Lester Vincent, my partner, and Nisha Agarwal,
16 who's our client.

17 BY MR. DUTTON:

18 Q And, Mr. Duncker, can I have you state your name
19 for the record.

20 A My name is Seymour Duncker.

21 Q Good morning. Have you been deposed before?

22 A No.

23 Q Okay. So I'll go through just a few kind of
24 ground rules here. My job today is to ask questions, and
25 your job is to answer them. Do you understand that today?

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

6

1 A Yes.

2 Q We have a court reporter here to transcribe the
3 questions and answers. Do you understand that?

4 A Yes.

5 Q And so I ask that we try not to talk over one
6 another so that the record is clear between question and
7 answer; is that fair?

8 A Yes.

9 Q With questions today, I ask that you have audible
10 answers so no like head nods, again to make sure that the
11 transcript is accurate; is that fair?

12 A Yes.

13 Q And I'll try to ask clear questions today, but if
14 there's a question that you don't understand, is it fair
15 for you to ask me to clarify?

16 A Sure.

17 Q And if you answer a question today, I'll assume
18 that you understood the question; is that fair?

19 A Sure.

20 Q And do you understand that counsel may object,
21 but you still have to answer the question unless
22 instructed not to answer?

23 A Yes.

24 Q And I'll plan to take a break approximately every
25 hour or so. But if you need to take a break sooner, just

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

7

1 let me know and we can go off the record. The only thing
2 that I ask is that if there's a pending question, that you
3 answer that pending question before a break; is that fair?

4 A Sure.

5 Q Do you understand that this case involves a
6 dispute between iCharts and Tableau?

7 A Yes.

8 Q And iCharts sued Tableau for patent infringement?

9 A Yes.

10 Q And we're here specifically today about an IPR to
11 challenge one of those asserted patents in that
12 litigation, right?

13 A Yes.

14 Q I'm handing the witness what has been previously
15 marked at this Exhibit 1001 to the IPR.

16 MR. MARINO: Okay.

17 THE WITNESS: I need to grab my glasses. So... excuse
18 me.

19 BY MR. DUTTON:

20 Q Do you recognize this document?

21 A Yes.

22 Q What is this document?

23 A It's the patent. It's the patent, yeah.

24 Q It's U.S. Patent 8,271,892?

25 A That's correct.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

8

1 Q And if I refer to this patent as the '892 patent,
2 will you understand what I'm referring to?

3 A Sure.

4 Q And you're listed as an inventor of this patent,
5 correct?

6 A Correct.

7 Q In your own words, what is the invention
8 described in the '892 patent?

9 A So my understanding is that this is pretty much
10 what the -- what the... oh, sorry. This is -- is this
11 the... this is the application, right? The provisional,
12 right? This is not the full patent.

13 Q This is the full, nonprovisional patent, Patent
14 Number 8,271,892. Do you see that on the top right?

15 A Oh, yeah. Yeah, sorry. Confused. So my
16 understanding is for a legal concept, is that the claims
17 describe the invention, so I'll just read the claims to
18 you.

19 So what is claimed is that a computer comprising
20 data module configured to store data, a chart template
21 module configured to store chart templates, a generation
22 (indecipherable utterance) module configured to generate
23 an interactive chart --

24 THE STENOGRAPHIC REPORTER: I'm sorry, could you speak
25 a bit slower. I'm sorry.

1 THE WITNESS: Sorry, sorry.

2 A generation module configured to generate an
3 interactive chart on a generation interface wherein the
4 generation interface is configured to enable a user to
5 generate the interactive chart from data stored in the
6 data module and the template from the chart template
7 module. A sharing module configured to enable a user to
8 publish on the interactive chart as a self-contained and
9 independent electronic document.

10 Wherein the self-contained and independent
11 interactive chart when opened in the program in the
12 absence of the generation interface and the chart template
13 module, enables a user to, A, render the chart, B, obtain
14 an input from a user, and C, rerender the chart using the
15 input as a parameter thereby enabling the interactive
16 chart to retain interactivity when published or embedded.

17 Two, the system of Claim 1 where the generation
18 interface is configured to receive data from a user and
19 transmit the data to the data module. Three --

20 BY MR. DUTTON:

21 Q Okay. So I appreciate that, you did a good job
22 reading Claim 1, but in your own words, what's the
23 invention of the '892 patent?

24 MR. MARINO: Objection to form.

25 You can answer.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

10

1 THE WITNESS: Yeah, so I can reread the claims again
2 because my understanding is that is the -- describes the
3 invention, but I can describe kind of in my own words
4 what -- you know, what the example is, you know, what I
5 was thinking of. Is that what you...

6 BY MR. DUTTON:

7 Q Yeah. That's what I guess I'm asking for is an
8 example of what you understood the invention to be
9 directed to.

10 A Sure. The -- you know, the original idea was the
11 ability to create an interactive chart by end users that
12 can be, you know, published and embedded anywhere on the
13 Internet. Right? And that essentially led to what is
14 described here, as the invention in the claims.

15 Q Okay. And what means did you use to publish or
16 embed an interactive chart anywhere on the Internet?

17 A So you're asking me in the context of the
18 implementation, how that actually technically worked,
19 right? That's my understanding?

20 Q Yes.

21 A Okay. So we would generate an embed code, right?
22 So, you know, in the -- in the studio our product, which
23 would allow the user to create the interactive chart,
24 there was then the capability to publish that chart.
25 Right? Which essentially that act of publishing made the

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

11

1 chart publicly available and produced an embed code that
2 then can be used to simply paste into any website that
3 then once the website got refreshed, would render the
4 interactive chart on any web page on the Internet.

5 Q Okay. And then if I could have you to turn
6 Figure 2, the '892 patent.

7 What's shown in Figure 2?

8 A Basically, the diagram that describes, you know,
9 what we build, right? Shows the data module, the
10 generation interface, the shared module.

11 THE STENOGRAPHIC REPORTER: Are you saying shared
12 module?

13 THE WITNESS: Sharer.

14 THE STENOGRAPHIC REPORTER: Sharer?

15 THE WITNESS: Yeah, the sharer module.

16 MR. DUTTON: S-h-a-r-e-r, sharer.

17 THE WITNESS: The chart template module. Online
18 portal websites where the charts would be embedded. Our
19 own portal website as well as external websites. And
20 independent documents, PPTs and PDFs where they also could
21 be embedded into.

22 BY MR. DUTTON:

23 Q Okay. You referred to a data module. Is that
24 what's labeled 216?

25 A Correct. Yes.

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

12

1 Q And the chart template module is labeled 220?

2 A Yes.

3 Q And you referred to a generation module. Is that
4 what you're -- is what you're referring to labeled 204?

5 A So there are two components to it, right?
6 There's a back end component, which is 204, and then
7 there's a front end component, 212. That both together
8 essentially constitutes the full generation capability.

9 Q Okay. So just so that I understand, your opinion
10 is that the generation module would be both the -- what's
11 labeled 204 as the generator and 212, the user interface?

12 A I would have to --

13 MR. MARINO: Objection to form.

14 You can answer.

15 THE WITNESS: Yeah. I would have to recheck the
16 patent to make sure that that's accurate what I'm
17 describing, but looking at this, that would be my -- my
18 sense, yes. But I can check the patent itself. I will
19 refer to this. Let me check the patent.

20 Well, the generator is 204. And the user
21 interface that allows a user to interact with the
22 generator is 212.

23 BY MR. DUTTON:

24 Q So what is your understanding of what in Figure 2
25 is the generation module that you referred to earlier?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

13

1 A I... I believe it... again, as I said before,
2 right, I think there are two components to that. It's --
3 it's the generation -- the back end generation module is
4 204. And then there's a user interface component to that
5 that's 212. 212, yeah.

6 Q Figure 2 shows lines between data 216 and the
7 generator 204. Do you see that or shows one line?

8 A Mm-hmm.

9 Q And it shows another line between 220 and 204,
10 right?

11 A Sure.

12 Q What do those lines represent?

13 A Lines of connectivity that the generator
14 essentially is somehow connected to and be able to
15 interact with the data module as well as the chart
16 template module.

17 Q Would the generation module receive data from the
18 data module 216, is that what's shown here?

19 A Yeah.

20 Q And the generation module would receive chart
21 templates from the chart template module 220?

22 A You could see it, yes, you could see that as a
23 repository for those chart templates.

24 Q You could see what as a repository for the chart
25 templates?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

14

1 A 220.

2 Q Okay.

3 A Because I'm able to generate my own templates,
4 right? So the generator would store those chart templates
5 in 220 and be able to retrieve those chart templates from
6 220 during the process of creation.

7 Q And what would be the hardware that would be the
8 repository for the chart templates?

9 A A database.

10 Q All right. The invention shown in Figure 2
11 doesn't show data from the data module to the sharer 208,
12 correct?

13 MR. MARINO: Objection; form.

14 THE WITNESS: Not in this diagram. Yes.

15 BY MR. DUTTON:

16 Q And the invention shown in Figure 2 does not show
17 a chart template between 220 and the sharer module 208,
18 right?

19 MR. MARINO: Objection; form.

20 THE WITNESS: Same thing. Not in this -- not in this
21 diagram.

22 BY MR. DUTTON:

23 Q Okay. So in the '892 patent, does the sharing
24 module receive data from data module?

25 MR. MARINO: Objection; form.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

15

1 THE WITNESS: The concept of the sharer module is
2 essentially to wrap the -- the interactive chart in such a
3 way that it can be shared on other websites. So that's
4 the objective of the sharer module, right.

5 BY MR. DUTTON:

6 Q What do you mean by wrap?

7 A It -- we essentially generate an embed code,
8 right? And essentially, put that into -- yeah, into an
9 embed code.

10 Q So the sharing module, what does is it -- strike
11 that.

12 So what you're saying is the sharing module will
13 put the interactive chart with an embed code?

14 MR. MARINO: Objection; form.

15 THE WITNESS: So more to it, right? So it would --
16 essentially, it's the heart of it is the publishing
17 functionality, right? So essentially, it allows me to
18 expose an interactive chart to the outside world, right?
19 So one act is the publishing piece. And then the second
20 act is the ability to wrap this into an embed code and
21 provision the embed code.

22 And then there could be additional methods to --
23 to share and distribute.

24 BY MR. DUTTON:

25 Q Okay. So the first step of the sharing module is

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

16

1 to publish the interactive chart?

2 A Yeah.

3 Q And then the second step would be to embed the
4 interactive chart in an embed code?

5 A Yeah.

6 MR. MARINO: Objection; form.

7 You can answer.

8 THE WITNESS: Yes.

9 BY MR. DUTTON:

10 Q So publishing would happen before embedding?

11 A Yes.

12 Q What is your understanding of publishing?

13 A Publishing is a well-understood mechanism in
14 online distribution of, you know, content functionality,
15 right, that allows me to essentially take something that
16 is private to me and expose it to online using online
17 methods to anybody on the Internet if I so choose.

18 Q If publishing happens before embedding, the
19 publishing itself wouldn't like produce it on -- produce
20 the interactive chart on the website, right?

21 MR. MARINO: Objection; form.

22 You can answer.

23 THE WITNESS: So I -- I have to embed it, right? So
24 publishing is a first step in that -- in that process.

25

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

17

1 BY MR. DUTTON:

2 Q Okay. So after it's published, it's still not
3 public, right?

4 A Well, so in our original, you know,
5 implementation, is the minute you would publish it, it
6 would appear on our own public portal, right? So in that
7 sense, we -- the minute you hit publish, the interactive
8 chart would be immediately available on our own portal,
9 which is here in 224, right, where people could then grab
10 it and further embed it, right?

11 So that's what the publish function did, right?
12 So it basically, in our implementation, had these two
13 aspects, right? So make it publicly available and expose
14 it immediately on our own -- on our own portal.

15 Q Okay. And we talked about chart templates
16 earlier. What is a chart template?

17 A So just to give you an example is if you look at,
18 you know, charts, interactive charts today in publications
19 like New York Times or any -- they have a very unique,
20 specific style, right? The New York Times look and feel
21 versus the, you know, Wall Street Journal look and feel,
22 right?

23 And so chart templates essentially allowed the
24 user to design the chart and then store the design of the
25 chart, right, including -- which is not only the design of

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

18

1 the chart, but, you know, is it a bar chart or a pie
2 chart. Right? And basically, store that template so it
3 could -- I can create a whole multitude of charts using
4 the exact same look and feel. Those are chart templates.

5 Q So a chart template are formatting settings one
6 of which can be a type of chart?

7 A Yes.

8 Q But the type of chart is not itself a chart
9 template, right?

10 A Could be. It's the most basic form of a chart
11 template.

12 Q So if I could direct your attention to Column 16,
13 line 28.

14 A So you mean -- oh.

15 Q Let me know when you're there.

16 A Yeah. Mm-hmm.

17 Q Okay. And that sentence, just for the record,
18 states that, The preset chart templates 4012, store
19 formatting settings, such as colors, chart size, fonts,
20 line thickness, et cetera, as a set.

21 Do you see that?

22 A Yeah.

23 Q And do you agree with that description of chart
24 template?

25 A Sure.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

19

1 Q So you agree that a chart template stores
2 formatting settings such as colors, chart size, fonts,
3 line thickness, et cetera, as a set?

4 A Well, as I mentioned before, I personally -- you
5 know, it's my perspective is -- would include also --
6 would also include the fact like what type of a chart it
7 is.

8 Q Okay. And then if we could go to Figure 40B.
9 40B shows a tab labeled, Presets on the top right, right?

10 A Correct. Mm-hmm.

11 Q And those presets are the chart templates?

12 A Yeah.

13 Q And are those -- those nine kind of charts that
14 are depicted on the right side of Figure 40B, are those
15 each a chart template?

16 MR. MARINO: Objection to form.

17 THE WITNESS: So as I mentioned before, is -- and this
18 is kind of like 15 years after, you know, I created these
19 original ones. And my understanding today, I would
20 consider chart templates both a combination of presets as
21 well as chart types. Right. So I would say it is the
22 combination of those. Right.

23 But here, it says presets. So it is presets.

24 BY MR. DUTTON:

25 Q Okay. And at the time of the invention, you had

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

20

1 a separate tab called chart types, right?

2 A Correct.

3 Q So at the time of the invention, you
4 differentiated between chart types and the preset
5 templates, right?

6 A Well, presets, right. So presets basically
7 meant, you know, configuration presets, and that's exactly
8 what it says, right? Presets. Again, as I said today, I
9 would consider a template a combination of those. I don't
10 exactly recall, you know, how -- how after we wrote it,
11 yeah, here.

12 Q In the '892 patent it refers to presets as chart
13 templates, right?

14 A Let me... well, just to -- just to be precise, we
15 write here in line 27, The preset chart templates, right?
16 So it's the combination of the chart template with a
17 preset. So, you know, I would have to restudy the whole
18 thing to try to... but it's the specific preset aspect of
19 a complete template. And, you know, as it says, yeah...

20 Q So in Columns 16, line 20, it refers to selecting
21 a preset chart template, right?

22 A Mm-hmm.

23 Q And to select a preset chart template, you would
24 select one of the nine options in Figure 40B.

25 A Yeah. Specifically, the preset. Right. So I

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

21

1 would -- the presets are one of those, you know,
2 capabilities.

3 Q Is it your opinion that selecting a chart type
4 alone would be sufficient for selecting a chart template?

5 MR. MARINO: Objection; form.

6 THE WITNESS: Can you repeat the question, please?

7 BY MR. DUTTON:

8 Q Is it your opinion that selecting a chart type
9 alone would be sufficient for selecting a chart template?

10 MR. MARINO: Same objection.

11 THE WITNESS: So in my personal opinion, an example of
12 an enriched chart template includes presets. Right. So
13 that makes the chart template powerful, the presets.

14 BY MR. DUTTON:

15 Q But is it your opinion that selecting a chart
16 type alone would be sufficient for selecting a chart
17 template?

18 MR. MARINO: Same objection.

19 THE WITNESS: I think presets are a key component of
20 that.

21 BY MR. DUTTON:

22 Q I'm not talking about presets. I'm talking about
23 a chart type. You understand the chart type, right?

24 A Right.

25 Q Bar chart?

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

22

1 A Sure.

2 Q Line chart is a chart type, right?

3 A Yeah.

4 Q Okay. Selecting a -- is it your opinion that
5 selecting a chart type alone would be sufficient for
6 selecting a chart template?

7 MR. MARINO: Objection; form.

8 THE WITNESS: So in our original thinking, if I
9 created a canvas that was able to, you know, be
10 presetable, the most basic form of that could be simply
11 an empty chart template where no presets are set and that
12 only contained a -- the chart type, like a bar chart and
13 all that.

14 So in that sense, I have difficulty
15 distinguishing the, you know, the two of them. Right. So
16 in the interpretation how we did -- how we built this, you
17 would essentially -- you need to say okay, I want to, you
18 know, select the chart type and then select the presets.

19 BY MR. DUTTON:

20 Q So you would select a chart type before selecting
21 a preset chart template?

22 A Presets. As it shows in the picture.

23 Q And the '892 patent refers to presets as preset
24 chart templates, right?

25 A Well, the emphasis is presets. If you -- yeah.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

23

1 Q In Column 16, line 21 through 22, it says,
2 Selecting a preset chart template, right?

3 A Yeah.

4 Q So at the time you or iCharts filed the '892
5 patent, iCharts separated preset chart templates and chart
6 types in its user interface?

7 A So we separated presets and chart types as two
8 components.

9 Q Are you saying that presets are not preset chart
10 templates?

11 A Look, this is -- this is, I don't know, 15, like
12 how many years this is back. So I don't know exactly
13 recall, other than what's written in here, how we exactly
14 thought about it, right? What I know and what we can see
15 here is that -- which makes sense, is that they're
16 presets. Which specifically, you know, referred to the,
17 you know, colors, types, whatever's listed here and the
18 actual type.

19 I do not recall how we thought about that, at
20 that time with regards to the term chart templates.

21 Q So you don't recall how you referred to the
22 distinction between chart templates and chart types at the
23 time of the invention?

24 A No. What I said is that I think what you're
25 trying to get to is trying to, you know, get me to say

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

24

1 whether -- what exactly was a chart template, was it just
2 a preset or was it a combination or was it types? I don't
3 recall that particular aspect of it. Right.

4 I can offer my today evolved perspective. But I
5 can't precisely -- I don't recall that particular aspect
6 on, you know, at the time when we came up with this thing,
7 with these ideas.

8 Q You can't recall what particular aspect?

9 A I can't recall whether we clearly referred to as
10 just the presets as the templates or the combination of
11 chart types and presets as templates. Today, my informed
12 perspective is that the combination is -- is -- represents
13 chart templates.

14 Q Okay. So just so that I understand, you don't
15 recall whether you referred to the combination of presets
16 and chart types as the chart template or just the presets
17 as chart templates, is that...

18 A So what we referred to in the patent, we say
19 preset chart templates. So that's clearly stated there,
20 right? But I can read the same sentence, preset chart
21 templates as the preset aspect of the chart templates.
22 And it does not exclude the -- the thought that, you know,
23 chart types are equally part of the chart templates.

24 Q Okay. I think I -- I think I understand that
25 you're saying that the chart type can be part of the

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

25

1 preset chart template?

2 A That's my evolved perspective today.

3 Q Okay. Can a chart type alone be a chart
4 template?

5 MR. MARINO: Objection to form.

6 You can answer.

7 THE WITNESS: I would -- well, I think it's highly --
8 you know, you can interpret this any way you want, right?
9 The fact of what is a template.

10 BY MR. DUTTON:

11 Q According to your current understanding of the
12 chart template, is a chart type alone a chart template?

13 A I think it requires presets as well. The ability
14 to, otherwise it's chart types, I select the chart type --
15 I select the chart type... and if I'm able to customize
16 those chart types, then for the -- then I can store this
17 as a template that I would consider today as a template.

18 Q Okay. So according to your understanding, a --
19 to be a chart template, a chart type would have to also
20 include presets?

21 A That's my evolved perspective today.

22 Q Okay. Is that also your understanding at the
23 time of the invention?

24 A I... as I said, you know, quite some time back.
25 So I'm not sure how we exactly thought about that

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

26

1 particular aspect. And I don't know that that actually
2 mattered at that time, right? We were focusing on, you
3 know, finishing the product. So... yeah.

4 Q All right. I'm handing the witness what has been
5 previously marked as Exhibit 2200.

6 Do you recognize this document?

7 A Sure. It's my declaration.

8 Q It's the declaration you submitted in this IPR
9 proceeding?

10 A Correct.

11 Q Okay. And if you turn to the last page, page 72,
12 is that your signature?

13 A Yes.

14 Q And you executed this declaration on August 6,
15 2025?

16 A Correct.

17 Q Are you prepared today to testify about the facts
18 in this declaration?

19 A Yes.

20 Q All right. If we could go to page 8. Page 8 is
21 the start of a table that goes -- that's titled,
22 Conception, Explanation and Supporting Documents. Do you
23 see that?

24 A Yes.

25 Q What's your understanding of conception?

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

27

1 A The phase where you are, you know, in a design --
2 in a design mode. Still coming up with all elements of
3 what you're inventing.

4 Q And what are you showing kind of in this section
5 of your declaration?

6 A It's a -- number one, is specifically an email
7 communication and document -- sorry, it's where our
8 initial set of documents where we start describing the
9 actual service. And I have to look up -- I don't know
10 exactly what the -- I have to look up the actual exhibits.
11 But I believe this is from a document from an initial
12 document that we -- you know, that we created -- that I
13 think I created at the time to describe our whole idea.

14 Q More generally, the section of your declaration
15 provides all the evidence that you rely on for conception?

16 A Well, this and the subsequent pages, right?

17 Q Right.

18 So pages 8 through 65 provide all the evidence
19 that you rely on for conception?

20 A Yeah, I believe that is true.

21 Q And do you understand that it's patent owner's
22 burden to show conception?

23 A I think so. Yes.

24 Q Okay. And you had access to additional material
25 that you could have cited, right?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

28

1 MR. MARINO: Objection; form.

2 THE WITNESS: I... anything that's relevant to
3 demonstrate that, we -- you know, I disclosed fully here,
4 yeah.

5 BY MR. DUTTON:

6 Q So the evidence that you were aware of that
7 were -- that was relevant to conception, you cited it here
8 in your declaration?

9 A I believe that's true. Yes.

10 Q All right. Let's start with --

11 A So let me -- let me add.

12 So I believe that the minimal set that's required
13 is in here. I'm not saying there might be additional
14 documents. Right, that, you know, didn't prove anything
15 additional. So it's not that old documents are cited, but
16 the minimal set to make the point.

17 Q Okay. So the evidence that you rely on to
18 establish conception are cited in --

19 A Correct.

20 Q -- these pages?

21 A Yes.

22 Q All right. Let's go to section -- I refer to the
23 1A, so page 9.

24 A Mm-hmm.

25 Q And 1A is -- the header includes, quote, A data

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

29

1 module configured to store data, end quote, right?

2 A Right.

3 Q And that's one of the elements of Claim 1 of the
4 '892 patent?

5 A Yes.

6 Q And for this element, you cite three documents to
7 support conception, right?

8 A Yes.

9 Q And these excerpts that you cite for Element 1A
10 relate to the function of uploading data, right?

11 A Well, they relate -- they show the entire system
12 diagram, and a component of that is the data module.

13 Q Is it your opinion that the data module is what's
14 identified as iData?

15 A That's correct.

16 Q And none of these excerpts you cite for
17 Element 1A show source code for data module, right?

18 A That is correct.

19 Q And none of these excerpts in Element 1A show the
20 hardware for data module, right?

21 A Sure.

22 Q Is that right?

23 A Yes.

24 Q And if you recall back to Figure 2 of the '892
25 patent, there was a line between the data module and the

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

30

1 generation module, do you recall that?

2 A Mm-hmm. Yes.

3 Q Does this diagram on page 10 show the generation
4 module?

5 A Yeah. As I lined out earlier, so iWiz is your
6 generation module.

7 THE STENOGRAPHIC REPORTER: I'm sorry, you said iWiz?

8 THE WITNESS: IWiz, i-W-i-z, is the generation module
9 combined with the user interface.

10 BY MR. DUTTON:

11 Q Is the user interface shown?

12 A Yes. It's -- what's depicted here as iWiz.

13 Q Okay. So that little -- little box within the
14 iWiz box on page 10, is that what you're referring to?

15 A Yeah.

16 Q What is the iChart portal?

17 A That is our public portal where once you
18 published the interactive chart in what we then called
19 studio, so our actual -- our product combined iData and
20 iWiz into a product. So when you clicked publish, it
21 would then appear on the iCharts portal making it
22 available to anybody that visited the portal to grab the
23 embed code and re-embed.

24 Q So is the iChart portal the same thing as the
25 iChart Studio?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

31

1 A No.

2 Q So what is iChart Studio?

3 A IChart Studio is the combination of iData and
4 iWiz into an end user product that would allow users to
5 create interactive charts which had two components. You
6 could upload the data and then drag and drop. That gave
7 you a canvas that you could drag and drop those elements
8 and create your interactive chart and then publish the
9 chart.

10 Q Was the iData and iWiz always combined in what
11 you called iChart Studio or was that something that
12 developed in this 2007 time frame?

13 A So -- so okay. We have to kind of distinguish
14 between product packaging, right, and how you present
15 yourself. So to the outside world, it is one thing,
16 right, one interface. But technically, these are
17 independent components that act together to constitute a
18 whole product.

19 Q Okay. I'm pretty sure I understand.

20 But just to make sure, iChart Studio is the
21 combination of iData and iWiz?

22 A Correct.

23 Q Okay. And then you have a separate iChart
24 portal, right?

25 A Correct.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

32

1 Q And the iChart portal would store already
2 generated charts?

3 A It would -- it would display the published charts
4 after the studio user decided to publish them.

5 Q Okay. And then someone from the public could go
6 and download a chart from iChart portal?

7 A More precisely, grab the embed code from the
8 portal to re-embed it on another website, that was the
9 focus use case.

10 Q Okay. Is that because the iCharts were stored
11 locally like on an iChart server?

12 A So the -- I'm not sure I understand your
13 question. Can you...

14 Q So you said that the public could go and grab the
15 embed code from the portal. So that would -- the embed
16 code would have a link to the iChart, so to speak, the
17 interactive chart?

18 A Well, it would have a link back -- link that once
19 you embed the -- you know, once you paste the embed code
20 on any website, what would happen in that very moment when
21 you open that website, it would execute the embed code and
22 would essentially do two things. It would fetch the
23 executable that allows you to essentially render the chart
24 then on -- you know, on any local computer that's opening
25 that web page.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

33

1 And it would have a reference to the iCharts
2 object which essentially is the metadata required. And
3 then fetch that metadata in real time. And then
4 basically, put it all together into, you know, what we
5 then referred to as an independent document that then
6 could be rendered as the page continues to open up.

7 Q Were the charts automatically public when they
8 were put on iCharts portal?

9 A Well --

10 MR. MARINO: Objection; form.

11 You can answer.

12 THE WITNESS: Yeah.

13 So the act of making them public is the publish
14 step, right, inside of studio, right? So as a user
15 creates a chart in studio or in what we called -- what's
16 still referring to an iWiz -- iData, iWiz. That chart was
17 private. Right. And then the -- when the user made the
18 active decision to hit the publish button, that would be
19 the moment where this chart then would appear on the
20 iCharts portal.

21 BY MR. DUTTON:

22 Q And then when it was on the iCharts portal, that
23 would be available to everyone or --

24 A Yes.

25 Q Okay. If we can go to page 11. Which includes

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

34

1 the section for Element 1B. Which is quote, A chart
2 template model configured to store chart templates. Do
3 you see that?

4 A Yes.

5 Q And here, you cite five excerpts to show the
6 chart template module.

7 A Yeah.

8 Q None of these excerpts show source code for the
9 chart template module, right?

10 A Sure. Yes, I mean, we're still in January 10,
11 2007. So that was a couple of weeks after we came up with
12 the idea.

13 Q And none of these excerpts you site for
14 Element 1B show the hardware for a chart template module,
15 right?

16 A They don't show them explicitly, but they imply
17 it, right? So when you look at page 14, we have a web
18 service. And a web service requires hardware to -- to
19 implement. Right.

20 Q What's cited on page 14 is for the generation
21 module, not the chart?

22 A Sure.

23 Q So what's cited on page 14 is for the generation
24 module, not the chart template module, right?

25 A Yes.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

35

1 Q And what you cite for Element 1B, which is the
2 chart template module element, you don't cite any --
3 anything that shows the hardware for the chart template
4 module, right?

5 A Not in those five excerpts, yeah.

6 MR. DUTTON: Okay. I think now would be a good time
7 for a quick break.

8 MR. VINCENT: Sure.

9 (Recess taken.)

10 BY MR. DUTTON:

11 Q Welcome back.

12 All right. I think we left off, start on
13 page 14.

14 A Mm-hmm.

15 Q Which is the section for Elements 1C and 1D. Are
16 you there?

17 A Yes.

18 Q And here you cite four excerpts for support for
19 conception.

20 A Yeah. Yes.

21 Q And to confirm, you're saying that the iWiz is
22 the generation module?

23 A Yes.

24 Q Is iData also the generation module?

25 A IData is the data module.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

36

1 Q Okay. And then the against interface would be
2 the user interface for iWiz?

3 A Correct.

4 Q And so the red box that's drawn around page --
5 the excerpt on page 15 includes what you're saying is the
6 data module, the generation module, and the generation
7 interface as well as the iChart. Is that iChart
8 publisher?

9 A So that is the -- that is the object, the
10 interactive chart that then can be embedded on a website.

11 Q So the iChart shown on page 15, the far right box
12 of that excerpt, is the interactive chart itself?

13 A Correct.

14 Q So what's the arrow labeled download in that
15 excerpt?

16 A So allows you to download the chart so that you
17 then can embed it into, for example, a PowerPoint or PDF
18 document.

19 Q Okay. So is that like download arrow, is that
20 really from iWiz, like extending kind of around the iChart
21 box?

22 A No. In this case, it is -- I believe this what
23 we have drawn here was the precursor to what we then would
24 refer to as our portal, right? So the ability to download
25 was, you know, both in iWiz as well as in the portal

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

37

1 itself.

2 Q Okay. So the portal's not shown, but that would
3 be where it would be downloaded?

4 A Yes.

5 Q Okay. Do the excerpts you cite for Elements 1C
6 and 1D show a chart template module?

7 A Well, it -- on page 14, we reference it. That is
8 already stored here such as a chart template. And then we
9 further reference it on page 16, choose a type of a chart
10 from a chart gallery.

11 Q So let's start on the first excerpt, which is --

12 A Yeah, sorry. Apologies. And then furthermore,
13 From a gallery, users can select finished charts with
14 predefined (indecipherable utterance) content from marquee
15 professional data services.

16 THE STENOGRAPHIC REPORTER: I'm sorry, predefined
17 what?

18 THE WITNESS: Predefined content from marquee
19 professional data service providers.

20 BY MR. DUTTON:

21 Q Okay. So that last excerpt, that's from 2002?

22 A Correct.

23 Q And that's selecting finished charts, right?

24 A Yes.

25 Q Those are already generated charts?

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

38

1 A Yes.

2 Q And those charts would be from the iChart portal
3 for example?

4 A Yes.

5 Q And so that would -- so let's go to the first
6 excerpt on page 14, Exhibit 2008. Does that diagram show
7 a chart template module?

8 A The -- not graphically, but we reference the
9 chart templates in the description above.

10 Q But just to be clear, that description above is
11 not from Exhibit 2008, right, that's your summary?

12 A Do you have the actual exhibit with you? I want
13 to just...

14 Q Not sure I do.

15 A I want to understand what the original source for
16 that was.

17 Q No, I don't have a copy of Exhibit 2008.

18 A So I wouldn't be -- so I would need to
19 understand. I need to look up what the actual document
20 was, whether we had, you know, provided additional context
21 or this is just a graphic. So I don't recall. I would
22 have to look at the actual exhibit.

23 Q Okay. If we go to page 8. The table header is,
24 Conception explanation and supporting documents, right?

25 A Right.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

39

1 Q And the italicized description kind of at the
2 beginning is your explanation, right?

3 A Yes.

4 Q So if we then go to page 14, that is -- the same
5 thing is true here, the italicized font is your
6 explanation of the evidence, right?

7 A Yeah, you could infer. That's why I would like
8 to see the Exhibit 2008 to be fully certain. But yeah,
9 you could infer that. Yes.

10 Q And the flow diagram that you show on page 14
11 from Exhibit 2008, that does not include a chart template
12 module, right?

13 A Correct.

14 Q And the same thing for the excerpt on page 15,
15 that excerpt from Exhibit 2005 does not show a chart
16 template module, right?

17 MR. MARINO: Objection; form.

18 THE WITNESS: It does not explicitly reference the
19 word chart template. But it is -- it's a graphic that
20 allowed the -- that I could interpret as such, right? So
21 I'm taking, you know, you see three consecutive images,
22 that basically is a flow of a -- creation flow, right? So
23 you start with a type. Then you choose a template, and
24 then you design the actual chart. So I could, you know --
25 it doesn't explicitly say template.

1 But the iWiz diagram essentially outlines the
2 idea. Do you see the iWiz, the three graphs, graphical
3 object that go from left to center to right. That is the
4 chart creation process.

5 BY MR. DUTTON:

6 Q So you're reading in a chart template module from
7 the word create and the arrow between the data module and
8 the generation module?

9 A No. From -- I'm -- I'm inferring from the
10 graphical description inside iWiz. Inside iWiz, I have
11 three objects that basically show an arrow going from left
12 to center to right. Which is typically the three stages
13 of a chart when you create the chart.

14 Q And those three objects are those blue squares?

15 A Yes. Inside iWiz.

16 Q So you're interpreting one of those blue squares
17 as the chart template module?

18 A Yes.

19 Q Are you aware of anything that says that blue
20 square is a chart template module?

21 A There's -- the term is not actually used on the
22 page.

23 Q So in that case, would the chart template module
24 be part of the generation module?

25 A It constitutes its own component. So this is an

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

41

1 end user description of the product that we built. And
2 from an end user perspective, you have iWiz, which is part
3 of what we later on called studio and which would allow a
4 user to select a chart template. Technically, it
5 constitutes its own component under the (indecipherable
6 utterance) hood.

7 THE STENOGRAPHIC REPORTER: Under the what?

8 THE WITNESS: Under the hood.

9 BY MR. DUTTON:

10 Q Under the hood of the generation module?

11 A Under the hood of our system.

12 Q The system being iCharts Studio?

13 A The entire concept.

14 Q So the entire flow diagram shown on page 15 of
15 your report?

16 A So I'm using the term system as a general term.
17 So again, so the studio is what constitutes -- what we
18 refer to -- what we built was the combining iData and
19 iWiz, and that included the -- under its -- under the
20 engine that included the -- both the generation as well as
21 the template.

22 Q But this figure on page 15 of your declaration
23 doesn't show the details of the -- what's under the hood?

24 A Correct.

25 Q Do either of these excerpts on pages 14 and 15 of

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

42

1 your report show a chart template being received by the
2 generation module?

3 A No, it doesn't. This is an end user view of --
4 of another system's diagram.

5 Q Okay. All right. Let's move to Elements 1E and
6 1F. And these elements relate to the sharing module,
7 right?

8 A Well, they refer to the publishing and embedding.

9 Q Okay. A sharing module configured to enable a
10 user to publish or embed the interactive chart --

11 A Sharing module, yes. Correct.

12 Q Okay. And for this element you cite various
13 documents, right?

14 A Yes.

15 Q Okay. It goes from page 16 to 25?

16 A Mm-hmm. 20 -- yes, 25. Correct.

17 Q What specifically is the sharing module that
18 you're pointing to for this element?

19 A So it's outlined here on page 16, A sharing
20 module configured to enable a user to publish or embed the
21 interactive chart as a self-contained and independent
22 electronic document, wherein the self-contained and
23 independent interactive chart, when opened in a program in
24 the absence of a generation interface and the chart
25 template module, enables a user to render the chart,

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

43

1 (indecipherable utterance) obtain input from a user and --

2 THE STENOGRAPHIC REPORTER: I'm sorry, you're speaking
3 really fast.

4 THE WITNESS: Sorry about that.

5 Okay. A sharing module configured to enable a
6 user to publish or embed the interactive chart as a
7 self-contained and independent electronic document,
8 wherein the self-contained and independent interactive
9 chart, when opened in a program in the absence of the
10 generation interface and the chart template module,
11 enables a user to, A, render the chart, B, obtain input
12 were a user, and C, rerender the chart using the input as
13 a parameter thereby enabling the interactive chart to
14 retain interactivity when published or embedded.

15 BY MR. DUTTON:

16 Q So for example on page 17, you have an excerpt
17 from Exhibit 2009. Do you see that?

18 A Yes.

19 Q And this shows iChart Studio receiving data,
20 right?

21 A Correct.

22 Q And I believe we established earlier, that you're
23 identifying iChart Studio as a combination of the iWiz and
24 iData?

25 A Correct.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

44

1 Q So the iChart Studio was the generation module
2 and the data module?

3 A Correct.

4 Q So is iChart Studio also the sharing module?

5 A It could -- it also contains the ability to
6 publish. So yes. That also is contained -- includes the
7 sharing module.

8 Q Okay. So it includes the sharing module, but the
9 sharing module isn't shown in this excerpt from
10 Exhibit 2009; is that right?

11 A It's implied. Because it says, Publish online.
12 So that implies the sharing action.

13 Q Okay. Is the sharing module specifically
14 identified in Exhibit 2004 on page 18 of your declaration?

15 A It is mentioned above in Figure 2. In the
16 Exhibit 2004, we don't explicitly mention it.

17 Q Okay. So Exhibit 2004, this excerpt that you
18 have here doesn't explicitly mention the sharing module;
19 is that right?

20 A No, it does not explicitly mention it. It
21 implies it.

22 Q Okay. And the figure that you pointed to
23 previously, Figure 2, that's from the '892 patent, right?

24 A Correct.

25 Q That's not from earlier documents?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

45

1 A Correct.

2 Q Do any of the excerpts you cite for Elements 1E
3 and 1F show source code for the sharing module?

4 A On page 20, we -- the top part, we show, there's
5 an email where I outline how -- where I show a snippet of
6 source code, specifically, the embed code, how this would
7 work.

8 Q Okay. So that embed code that you show in
9 Exhibit 2014, is that the embed code that is also
10 represented in the next excerpt from Exhibit 2015, HTML
11 embed code?

12 A So... 2015. Could you point me to Exhibit 2015?
13 I see 14.

14 Q Yeah. So the -- it's on page 20. And the
15 citation is on page 21 on the first line.

16 A Oh. Yes. Correct.

17 Q Okay. So the -- both, what's in Exhibit 2014 and
18 Exhibit 2015, those are examples of embed code used to
19 embed an interactive chart into a web page?

20 A Correct.

21 Q The embed code is not source code for iChart
22 software though, right?

23 MR. MARINO: Objection; form.

24 THE WITNESS: The source code, it's an output of what
25 the source code generates. So we generate the embed code

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

46

1 and provide that. So I suppose you wouldn't consider
2 that -- yeah, no. It would not be considered part of the
3 source code.

4 BY MR. DUTTON:

5 Q So the embed code itself is not part of the code
6 for the sharing module, right?

7 A It's produced as part of the action, but it's...
8 so -- so somewhere in the source code, there's a reference
9 to what -- there's a template of that embed code, how this
10 embed code needs to look like. So from that perspective,
11 there will be in the source code, something similar to
12 this -- like looks like this embed code that then gets
13 parameterized and filled during the publishing act.

14 So there will be an artifact that looks like this
15 in the source code.

16 Q But the HTML code is an output from the source
17 code, it's not itself showing the source code for the
18 sharing module?

19 A Correct.

20 Q And do any of the excerpts you cite for
21 Element 1E and 1F show the hardware for the sharing
22 module?

23 A I don't believe so.

24 Q Okay. So let's go to -- go back to page 20. And
25 this excerpt shows kind of the process that you're relying

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

47

1 on to show the embedding and publishing of an interactive
2 chart?

3 A Correct.

4 Q And you have basically two branches of publish
5 shown in this excerpt, right?

6 A Correct.

7 Q So there's -- this is showing two ways to publish
8 an interactive chart?

9 A So in my belief, it is that publishing is
10 associated with the -- with the online process of -- of
11 being able to share and distribute online. That -- that
12 is what publish means.

13 Q All right. So let's -- let's start with the kind
14 of bottom branch on the excerpt from Exhibit 2015. The
15 first example of publish that you show is publishing an
16 iChart as a self-contained Flash object, right?

17 A The bottom part shows that. My belief today,
18 this should actually be written at download.

19 Q Okay. But at the time you wrote it as publish,
20 right?

21 A At the time, in this document, it's obviously
22 written as publish.

23 Q Okay. So at the time, your understanding was
24 iChart Studio would publish an interactive chart when
25 downloading the chart as a shockwave Flash object?

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

48

1 A That was -- so I'm pretty certain that we didn't
2 think, you know, through the exact specific wordings at
3 that time. We were extremely focused on building the
4 product. So very clearly, publish is an online process,
5 and download is the other process.

6 So I'm pretty certain, if we would -- this
7 would -- should be written, should be actually saying
8 download, not publish. And we probably didn't
9 sufficiently think to the exact meaning of the phrases at
10 that time when we wrote this. So the bottom part is
11 download. The upper part is publish.

12 Q Okay. Would downloading an interactive chart as
13 a shockwave Flash object enable a user to publish the
14 interactive chart?

15 A It would enable a user to embed the interactive
16 chart. Right. But you don't have the embed code. Right.
17 And you don't have the easy mechanism that allows you to
18 share the chart from -- from side to side. Right. So you
19 would be able to, you know, put into a PDF document. You
20 could put it into a website, but it's a different route
21 than the publish route.

22 Q Okay. So you agree that downloading the
23 interactive chart as a shockwave Flash object would enable
24 a user to embed the interactive chart?

25 A Correct.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

49

1 Q Okay. Let's look at the top branch now. And you
2 also label that arrow publish. Is that also an error?

3 A No. That is the publish path.

4 Q Okay. And in that HTML embed code -- I guess
5 what exactly is the publish part of that process?

6 A So the publish part has a couple of elements to
7 it. Number one, you basically determine that this -- this
8 object is now publicly accessible, so that's a, you know,
9 database update. And you then generate the embed code and
10 basically fill it with the details with the link and the
11 object ID that you had in the embed code.

12 And those are the, you know, two core parts,
13 right? And we also in our -- when we built the system, we
14 essentially would generate a page that then would be
15 publicly visible on the iCharts portal, right. So -- so
16 that constitutes kind of like the (indecipherable
17 utterance) end-to-end flow for publishing.

18 THE STENOGRAPHIC REPORTER: I'm sorry, kind of the
19 what?

20 THE WITNESS: Sorry. That kind of -- constitutes the
21 end-to-end flow for the publishing action.

22 THE STENOGRAPHIC REPORTER: Thank you.

23 BY MR. DUTTON:

24 Q Okay. So in your understanding is a requirement
25 of publishing to make it publicly accessible?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

50

1 A I would say so, yes.

2 Q Okay. And then the second core part would be to,
3 in this example, generate the embed code?

4 A Yes.

5 Q And for that first part of making it publicly
6 accessible, would then publishing in your embodiment, the
7 publicly accessible part is the automatic kind of
8 publishing on iCharts portal?

9 A Sorry --

10 Q That's a bad question.

11 A Yeah, could you...

12 Q Yeah.

13 Are you saying that the publicly accessible part
14 of your invention was met kind of in these early -- early
15 stages by automatically publishing on the iCharts portal
16 when you kind of generate the embed code?

17 A Well, the fact is now that anybody can grab the
18 embed code from that portal. The portal is simply like a
19 canvas that people can -- you need to be able to discover
20 a chart, you need to go have a place to go to, right. So
21 there, people can go to grab -- further grab the embed
22 code and now, embed it on the next site. Right?

23 So that -- publishing enables that process.

24 Q So you're saying that publishing the iChart is
25 publishing basically the HTML code in order for someone to

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

51

1 like retrieve the chart?

2 A Yes.

3 Q And a user would retrieve the chart through like
4 the source in the HTML code, the SRC equals like the URL?

5 A So again, it's a little bit hard for me to, you
6 know, separate from what we actually built, right? So
7 essentially, in order for a user to -- so the user needs
8 an ability to discover, right? So the ability to
9 discover, that's where in these pictures, the portal comes
10 in. Right.

11 So once the chart is listed on the portal, that
12 allows a user to go to that particular chart, and then
13 within the chart, there was a capability for the user to
14 grab the embed code. And now, they could go to a -- to
15 their own website and place the embed code there.

16 Q Do any of these excerpts show how the iChart
17 Studio would present the HTML code for a user to like just
18 have the ability to discover the code?

19 MR. MARINO: Objection; form.

20 THE WITNESS: I would have to look through the
21 documents. But essentially, we had two location. One was
22 in studio where you could click and get the embed code,
23 and the second was in each (indecipherable utterance)
24 interactive chart.

25 THE STENOGRAPHIC REPORTER: In each what?

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

52

1 THE WITNESS: In each interactive chart you would have
2 a button that would reveal the embed code. Think of
3 today, like how YouTube works, right.

4 BY MR. DUTTON:

5 Q Do any of the -- or excerpts that you cite for 1E
6 and 1F show the option to click in iStudio to get the
7 embed code?

8 A So it's inferred on page 20. When you click
9 publish or when you have, you know, the upper path you
10 have publish from studio, and then an embed code is shown.
11 And then you have another arrow showing embed, that's how
12 you would embed it to your portals or home pages or
13 anything. So it's inferred through that process.

14 Q Okay. So the option to have the embed code
15 available is inferred but not explicitly in these
16 excerpts?

17 MR. MARINO: Objection; form.

18 THE WITNESS: It's -- you know, it doesn't show the
19 exact click. You know, this is still like early stage,
20 but the idea is there.

21 BY MR. DUTTON:

22 Q When you say the idea is there, you're kind of
23 pointing to the arrow that says publish?

24 A Correct. Publish. And then it shows the HTML
25 embed code and then there's another arrow that is embed,

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

53

1 says embed, and that allows you to put it into a -- any
2 website.

3 Q There's nothing in the excerpt that says a user
4 would be able to copy and paste this HTML embed code from
5 the user interface, for example, right?

6 A Not in this explicit diagram.

7 Q Okay. And the diagram, like going back to the
8 bottom -- bottom branch. The -- that shows the iChart
9 shock wave Flash object, is that an SWF file extension?

10 A Yes.

11 Q Okay. And you say the self-contained -- it's a
12 self-contained Flash object?

13 A Correct.

14 Q What does it mean to be self-contained in your
15 opinion?

16 MR. MARINO: Objection; form.

17 THE WITNESS: Self-contained means that it can run and
18 render wherever it is placed and embedded. Does not
19 require an external server or any source to render,
20 basically.

21 BY MR. DUTTON:

22 Q Would the HTML embed code be self-contained?

23 A The self-contained nature materializes in the
24 very moment the page opens up because what the embed code
25 does, it fetches the -- the executable code, and it

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

54

1 fetches the metadata. And in that very moment, once the
2 page has completed to build, all of the source code is in
3 the page, and then the rendering starts executing that
4 code that now lives inside the page. So it's a step
5 towards that.

6 Q Okay. So when the embed code is in HTML page, it
7 would be self-contained?

8 MR. MARINO: Objection; form.

9 THE WITNESS: So the self-contained nature
10 materializes in the very moment a user opens the page.

11 BY MR. DUTTON:

12 Q Okay. And that would require an external server,
13 right?

14 MR. MARINO: Objection; form.

15 THE WITNESS: So very nature of any web page is -- is
16 that the page is served up by a server, right? However,
17 the -- that is pre the rendering, basically, pre the
18 rendering step, right? So you need to supply the HTML
19 page, right? And once -- and HTML page is finally
20 constructed, now it starts -- the local -- your laptop --
21 starts processing that code. In that moment once it is
22 finalized, it's self-contained.

23 BY MR. DUTTON:

24 Q So after the HTML page is constructed and the
25 process is finalized, is it also independent, the

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

55

1 interactive chart?

2 A Yes.

3 Q And that's because it no longer needs to fetch
4 the interactive chart from an external server?

5 A Correct. So if you type in the URL into a web
6 page, whatever that server URL is sends you that page, and
7 once the page is on your laptop, you render the page. You
8 can disconnect the laptop and interactive chart would
9 still be interactive.

10 Q Okay. If someone wanted to update the chart,
11 would they be able to do so by saving a kind of updated
12 version of the iChart at the same file path that's
13 identified in HTML code?

14 A Yeah, so how updating would work is in the
15 studio, they would go there, make the updates, whatever
16 they want, and once they click save, right, the next time
17 you refresh your page, then you would get the updated
18 chart.

19 Q Okay. So the chart would still be hosted kind of
20 on an external server, and when you refresh the browser,
21 it would retrieve the iChart from iChart's server?

22 A As I just earlier described the process of how
23 page building works, right, so I -- now I'm refreshing the
24 page. It's like fetching a new page. And in that moment,
25 the page gets constructed, and once it's finished

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

56

1 constructing, the page is finished, it's a self-contained
2 document. Now, the rendering starts on your local
3 computer. It has all the updated information at that
4 point.

5 Q Okay. So during the process of loading the HTML
6 page, the iChart is not self-contained and independent,
7 but after the final rendering of the web page, it's
8 self-contained and independent?

9 MR. MARINO: Objection; form.

10 THE WITNESS: So I -- that has nothing to do with
11 the -- the -- with the chart itself. Right. It's just
12 the very nature of how a web page gets constructed, right.
13 So you have adds on another page. The adds don't live
14 local, but they get supplied, all the components get
15 supplied in real time in the microsecond you open the
16 page. Right. And then you have the full thing on your
17 page.

18 So the very nature of self-contained is the
19 minute everything has been supplied.

20 BY MR. DUTTON:

21 Q Is a shockwave Flash object self-contained and
22 independent?

23 MR. MARINO: Objection; form.

24 THE WITNESS: It can be independent and
25 self-contained. Yes.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

57

1 BY MR. DUTTON:

2 Q And that's because you can open a Flash object
3 and program different than iStudio or iChart Studio?

4 A So (indecipherable utterance) when in studio, you
5 generate the chart, right?

6 THE STENOGRAPHIC REPORTER: I'm sorry, so when what?

7 THE WITNESS: When you are in iChart Studio to
8 generate your chart, then essentially, what we've
9 constructed is that -- is, you know, a specific
10 implementation how we built this, this thing is that it
11 will be a self-contained object. It's not an inherent
12 feature in Flash itself.

13 BY MR. DUTTON:

14 Q Okay. Let's go to Figure 30 of the '892 patent.
15 Kind of switching the documents here. What's shown in
16 Figure 30?

17 A A -- a dialogue that basically gives you a number
18 of various options to -- you know, what you can do with
19 the chart.

20 Q It provides various options for publishing a
21 chart?

22 A Options such as embedding the charts or
23 downloading the charts and sending the link to the chart
24 via email.

25 Q And those options are labeled, Publish iChart?

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

58

1 A So in this early diagram, it -- the title says,
2 Publish iChart, yes.

3 Q And so one option in Figure 30 for publish iChart
4 is download iChart as interactive object for embedding
5 into PDF or PowerPoint; is that right?

6 A That's what it -- what, you know, could read it
7 as, how we effectively then built it was -- as we
8 discussed before, these are two different routes, right?
9 So, you know, this diagram is from a time where we
10 probably hadn't fully, fully cleaned up the terminology.
11 Because download is not published very clearly, right?

12 So you either download it, or you publish it.
13 And that's how we've manifested it in the actual product
14 that we then built.

15 Q But this option of downloading an iChart as an
16 interactive object the '892 patent identifies as a publish
17 option, right?

18 MR. MARINO: Objection; form.

19 You can answer.

20 THE WITNESS: So in -- well, so in the -- I will have
21 to read the -- our claims again. So we clearly say in our
22 claims that the, Sharing model configured to enable a user
23 to enable the publish or embed the interactive chart. So
24 download, I believe, is -- is a separate feature that's
25 not explicitly mentioned in our claims here. Which makes

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

59

1 sense. Because they're separate.

2 BY MR. DUTTON:

3 Q So the description including Figure 30 includes
4 download as one of the options to publish iCharts; is that
5 right?

6 MR. MARINO: Objection; form.

7 THE WITNESS: So it shows a grouping that has as a
8 title publish, and then you have various selection boxes.
9 So, you know, it shows that. But as I just mentioned,
10 right, in the product that we built and we released at
11 that time, these were separate pathways.

12 BY MR. DUTTON:

13 Q Are you saying that this is an error, that the
14 download option should not be part of the published
15 iChart?

16 MR. MARINO: Objection; form.

17 You can answer.

18 THE WITNESS: So this is -- this diagram was created
19 along the way, obviously, our thinking was evolving. And
20 as we manifested and built the actual product that's in
21 the final stages, we clarified a lot of these concepts,
22 what they actually meant. And so publish was very clearly
23 this route that we already discussed. And download is
24 just a separate -- separate action.

25

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

60

1 BY MR. DUTTON:

2 Q So the interpreting download iChart as an
3 interactive object for embedding into PDF or PowerPoint,
4 that being a type of publishing would be consistent with
5 the diagram on page 20 of your report, right?

6 A So as I said again, evolving the early stage,
7 right, so I think these are -- if I -- like the diagram,
8 for example, was -- let's check the diagram. The diagram
9 itself, you know, was a point in time when we released the
10 product, right, and, you know, as we were implementing and
11 executing the product, this is publishing and downloading
12 was separate, you know, action.

13 So I think that, you know, these graphs -- so the
14 actual like manifestation, the product, separate thing.

15 Q The product was released after you filed your
16 patent application, right?

17 A So as you probably know, product does not
18 suddenly appear. It's many, many, many stages in the
19 process. Right. So we had early, early versions of the
20 product in parts of the product and already in 2007.
21 Right. So this is -- this is I believe we -- I have to
22 look at when we file the actual patent.

23 But I think the complete product in its entirety,
24 you know, I would say was -- was sometime early 2008.
25 Pretty much. Mostly there. But work in progress. Right.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

61

1 Q So you filed the application for the '892 patent
2 on September 5th, 2008?

3 A Correct.

4 Q Right.

5 And I believe you launched your product later
6 than September 5th, 2008, right?

7 A Four days later.

8 Q Okay. So just so that I understand what you're
9 saying, in Figure 30, you referred to downloading an
10 iChart as an interactive object for embedding the
11 PowerPoint or PDF as a publish option. But you later
12 changed it when you launched the product?

13 A The -- the actual -- this is a diagram, right?
14 This is a concept page, right? So the actual -- in the
15 product itself, publish was very clearly supporting the
16 publish route. And we disentangled that from the download
17 option because that's confusing. Because publish and
18 download are two different aspects.

19 Q Okay. Are one of... which of these options in
20 Figure 30 would you now consider to be publishing?

21 A Embed, yeah, the ability to embed the iCharts.

22 Q So the first option?

23 A Yeah.

24 Q So there's six other options listed in the
25 publish iChart pane, right?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

62

1 A Yes.

2 Q So are you saying that those six other options
3 are not publishing?

4 A They are downloading. So five of those are
5 downloading, 1, 2, 3, 4, 5 -- yeah, five are downloading.
6 And then the sixth one is sending a link to the iChart via
7 email.

8 Q So are any of those downloading iChart options
9 publishing?

10 A I would not constitute them as publishing.
11 They're downloading.

12 Q But at the time you filed your patent
13 application, all these options were considered publishing,
14 right?

15 MR. MARINO: Objection; form.

16 THE WITNESS: It -- it says in this diagram, but the
17 product that we had built and pretty much finished before
18 we finished -- before we filed the application, publishing
19 was separated from downloading as two separate, clearly
20 visible separate acts.

21 BY MR. DUTTON:

22 Q But it says in this diagram on Figure 30, that
23 downloading an iChart is publishing an iChart, right?

24 MR. MARINO: Objection; form.

25 You can answer.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

63

1 THE WITNESS: It says the title publish, and it has a
2 number of diagrams so you could make that inference, but
3 as I said, we hadn't -- we -- the actual implementation
4 separated very clearly between those two concepts.

5 BY MR. DUTTON:

6 Q So if I am understanding, you have disentangled
7 the publishing from downloading after you filed your
8 patent application?

9 MR. MARINO: Objection; form.

10 THE WITNESS: No. Absolutely not. This was as we
11 were building the first release of our product. Right.
12 Very clearly, that's when we implemented it in how it made
13 sense.

14 BY MR. DUTTON:

15 Q So after Figure 30 was created, you disentangled
16 downloading from publishing?

17 A So I don't -- I couldn't speak to the exact
18 timing, right. When we were billing the actual product
19 and seeing this, which, you know, actually happened all
20 the time. You know, 2007 and 2008, so I don't exactly
21 recall when we had clarified that particular aspect.

22 Q Okay. Someone looking at Figure 30, would it be
23 reasonable for them to conclude that downloading an iChart
24 was a publish option?

25 A I... that's in the beholder of the viewer. I

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

64

1 mean, if I would look at it, I would say that doesn't
2 really make sense.

3 Q But you could understand why a user looking at
4 Figure 30 may be confused but think that downloading an
5 iChart is an option for publishing an iChart?

6 MR. MARINO: Objection; form.

7 You can answer.

8 THE WITNESS: Because it is potentially confusing, we
9 didn't implement it in that way. Precisely because of
10 that. So we wanted to make sure that we don't conflate
11 the concept.

12 BY MR. DUTTON:

13 Q So to make sure that you didn't conflate
14 downloading publishing, you changed it in the implemented
15 system?

16 A We implemented -- well, we implemented it in such
17 a way that it was clear that these are two separate
18 concepts.

19 Q But do you agree that one way to interpret
20 Figure 30 is that downloading an iChart is one option of
21 publishing an iChart?

22 A What I agree with is it's confusing, how it is.
23 And so that's why we didn't implement it in exactly that
24 way. Because it's confusing.

25 Q And do you agree that in one of the documents

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

65

1 that you cited in conception, the downloading an iChart as
2 a shockwave Flash object, you referred to it as
3 publishing?

4 A In that document, it is written -- it says the
5 term publish. But very clearly, this is the download
6 path.

7 Q Okay. Was it reasonable for you to interpret
8 downloading as publishing when you were creating this,
9 this figure?

10 A Well, we were very focused on writing the code
11 and building the product. So I probably did not spend a
12 significant amount of time, you know, making sure that
13 every word like, you know, like that was -- so yeah. I --
14 we wrote, published -- it says publish in there, but it's
15 the download path. I don't know what else to say on this
16 one.

17 MR. MARINO: When you get to a good breaking point,
18 perhaps we can take a break.

19 MR. DUTTON: Okay.

20 MR. MARINO: But I don't want to cut you off in the
21 middle of a line of questions.

22 MR. DUTTON: Just kind of one thing here to close out,
23 and then we'll take a break.

24 MR. MARINO: Yeah.

25

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

66

1 BY MR. DUTTON:

2 Q The example on page 20 of your report. The top
3 branch, which is the branch that has the embed code. Does
4 that show two steps, first, a publishing step and then an
5 embedding step?

6 A Correct.

7 Q So the publishing occurs before the embedding?

8 A Correct.

9 MR. DUTTON: Okay. I think now it's a good time for a
10 break.

11 (Recess taken.)

12 BY MR. DUTTON:

13 Q Welcome back, Mr. Duncker. Before we break we
14 were talking about embedding and downloading and
15 publishing. Just want to kind of pick up there on just --
16 just a few more questions.

17 If we go to page 20 of your report, once the
18 Flash file's downloaded, a user can embed it in a
19 PowerPoint or PDF, right?

20 A Yes.

21 Q And at the time of the invention, would someone
22 knowledgeable in Flash know how to embed a Flash file into
23 a PDF?

24 A As far as I remember, it was a pretty
25 straightforward insert.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

67

1 Q Okay. And then also, at the time of the
2 invention, PowerPoint had a feature to embed a Flash
3 object into PowerPoint; is that right?

4 MR. MARINO: Objection; form.

5 THE WITNESS: I believe that was the case. But I
6 don't exactly remember.

7 BY MR. DUTTON:

8 Q Okay. So it wouldn't surprise you if it was also
9 a fairly straightforward process to embed a Flash file
10 into PowerPoint?

11 MR. MARINO: Objection; form.

12 THE WITNESS: I don't -- I don't -- I wouldn't exactly
13 remember that.

14 BY MR. DUTTON:

15 Q But you weren't the first one to embed a Flash
16 file into a PDF, right?

17 MR. MARINO: Objection; form.

18 THE WITNESS: I don't believe so.

19 BY MR. DUTTON:

20 Q And you weren't the first one to embed a Flash
21 file into a PowerPoint, right?

22 MR. MARINO: Objection; form.

23 THE WITNESS: Yeah. Sorry, can you repeat the
24 question? You said a Flash object?

25

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

68

1 BY MR. DUTTON:

2 Q A Flash file into --

3 A Flash file, yeah.

4 MR. MARINO: Objection; form.

5 BY MR. DUTTON:

6 Q So you weren't the first one to embed a Flash
7 file into a PowerPoint presentation, right?

8 MR. MARINO: Objection; form.

9 THE WITNESS: I believe so. Yeah.

10 BY MR. DUTTON:

11 Q You believe you were not?

12 A Yeah, not.

13 Q And embedding a Flash file into a PDF or a
14 PowerPoint would have been a straightforward process at
15 the time?

16 MR. MARINO: Objection; form.

17 THE WITNESS: I think it was a pretty straightforward
18 process, yes.

19 BY MR. DUTTON:

20 Q Okay. Let's go to page 26 of your declaration.
21 And at Section C, starts the additional limitations of
22 Claim 3. Do you see that?

23 A Yes.

24 Q Then on the next two pages, you cite two excerpts
25 to support those additional limitations in Claim 3, right?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

69

1 A Yes.

2 Q One excerpt is Exhibit 2004, right?

3 A Yes.

4 Q And one excerpt is 2017, if you look on the next
5 page, page 28?

6 A Yes.

7 Q Do either of these excerpts show a chart pane?

8 THE STENOGRAPHIC REPORTER: Sorry. You said chart
9 pane?

10 MR. DUTTON: Yeah, p-a-n-e.

11 THE STENOGRAPHIC REPORTER: Thank you.

12 THE WITNESS: Define, what do you mean with a chart
13 pane?

14 BY MR. DUTTON:

15 Q What's your understanding of a chart pane?

16 A Well, a chart pane could be either the interface
17 where you create --

18 THE STENOGRAPHIC REPORTER: The what?

19 THE WITNESS: Could be interface or the canvas where
20 you create a chart. Could be also the interactive chart
21 itself. So I'm not sure that there's a clear definition
22 of what a pane is.

23 BY MR. DUTTON:

24 Q Okay. If you look at Dependent Claim 3, you
25 agree that it requires a data pane and a chart pane,

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

70

1 right?

2 A Yes.

3 Q Do the two excerpts that you show for Claim 3
4 depict a data pane?

5 A It shows a -- the data in iWiz studio which had
6 the data pane as well as the chart pane as part of
7 creating the chart. Right. So it does not show the
8 actual -- the actual visual of the studio.

9 Q Okay. So the two excerpts that you cite for
10 support for Claim 3, do not themselves show a chart pane
11 or data pane, right?

12 MR. MARINO: Objection; form.

13 THE WITNESS: They don't visually show -- they don't
14 visually show that, yeah.

15 BY MR. DUTTON:

16 Q Okay. Let's go to page 43. And this is the
17 limitation for 10C of receiving a user selection of a
18 chart template in the chart pane wherein the chart
19 template is stored in the chart template module located on
20 a remote server. Do you see that?

21 A Yes.

22 Q And for this limitation you cite one excerpt,
23 Exhibit 2005, right?

24 A Yes.

25 Q And this excerpt does not show a server, correct?

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

71

1 A This is a user flow, so it wouldn't look -- it
2 would make sense to show a server here. But no, it does
3 not show a server.

4 Q And this is the only excerpt that you cite for
5 Element 10C?

6 A Yeah. Looks like it. Just to maybe -- can I add
7 to this?

8 Q Sure.

9 A Just to be clear, it says, iCharts portal, for
10 example, and a portal is essentially a remote server,
11 right. So it's kind of inferred by, you know, how these
12 concepts work. Right. So...

13 Q So you're relying on the iChart portal as the
14 remote server?

15 A Yes.

16 Q And earlier I believe you said that the chart
17 template module was in the iWiz shown as those blue boxes;
18 is that right?

19 A Correct.

20 Q So this does not show chart templates stored in
21 the iChart portal, right?

22 MR. MARINO: Objection; form.

23 THE WITNESS: I would say so, yes.

24 BY MR. DUTTON:

25 Q You would say that it does not show chart

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

72

1 templates stored in the iChart portal?

2 A Yeah, because that doesn't actually make sense to
3 me to, you know, because ultimately, then I generate the
4 chart. Then I, you know, select from a template, right?
5 And then the resulting chart object is what gets
6 referenced in -- you know, in the -- in the portal and in
7 the website. Yeah.

8 Q All right. So this excerpt would not show --
9 assuming that the iChart portal is a remote server, this
10 would not show a chart template module located on a remote
11 server, correct?

12 A By inference, yes.

13 Q And you don't show any other server other than
14 the iChart portal here?

15 A Well, again, so for example, there's -- it says
16 further below, any website. Any website is, you know,
17 provided to a server. And likewise, the iData and iWiz,
18 they are essentially, you know, operated through --
19 through a server, yeah. I guess I'm not 100 percent clear
20 what you are -- whatever you're trying to ask.

21 Q Sure.

22 So if I understand your testimony, you're saying
23 that the iChart portal is what you're pointing to for the
24 server, for Element 10C; is that right?

25 A It's a remote server, yeah.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

73

1 Q Okay. And that remote server would not have a
2 template module located on it, right?

3 A Yeah, just to be clear, so from an overall
4 construct, you have got multiple servers, multiple clients
5 involved into making this entire construct work. Right.
6 So there's not one single server in here. But, you know,
7 you have a client server paradigm around the studio,
8 right, and then you have, you know, remote servers where
9 we can distribute towards. So you have multiple server
10 constructs here.

11 So there is not a single server at play.

12 Q This excerpt doesn't show the architecture for
13 like the --

14 A Correct. Correct. This is a --

15 THE STENOGRAPHIC REPORTER: I'm sorry, you just spoke
16 over one another. I didn't hear that.

17 BY MR. DUTTON:

18 Q MR. DUTTON: This excerpt does not show the
19 server architecture for iCharts, correct?

20 A Correct. It's a user flow diagram.

21 Q And just to clarify, you agree that the chart
22 template module is not stored on the server for the iChart
23 portal, correct?

24 A Correct.

25 Q Okay. I'm handing the witness what has been

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

74

1 previously marked as Exhibit 2171.

2 A 21... 2171. Mm-hmm. Thank you.

3 Q Do you recognize this document?

4 A It's an email that I sent to Jennifer Hayes at
5 the time.

6 Q Jennifer Hayes was iCharts patent counsel?

7 A Correct.

8 Q If we go to page 12, in the email on the bottom
9 half of the page, and I'll just give you a quick moment to
10 review that.

11 A Sure.

12 Q Okay. So on June 29th, 2008, you arranged for a
13 meeting with Jennifer Hayes; is that corrects?

14 A Looks like it, yes.

15 Q And you suggested a meeting time of July 1st,
16 2008?

17 A Sure.

18 Q And then if you look at the email that follows
19 that's immediately above on the same page, Jennifer
20 responded around midnight of July 2nd; is that right?

21 A Yes.

22 Q And she said that she enjoyed speaking with you
23 and learning about your new invention, right?

24 A Sure.

25 Q And if we reference the cover page of the '892

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

75

1 patent, there's fields like that are numbered, one
2 numbered 60, do you see that?

3 A Yes.

4 Q And that indicates that the provisional
5 application was filed on July 2nd, 2008, correct?

6 A Yes.

7 Q Okay. So either the same day or the next day
8 after your first meeting with patent counsel, you filed --
9 or iCharts filed its provisional application?

10 A That's what it looks like, yeah.

11 Q Handing the witness what was previously marked as
12 Exhibit 1013. This is application number -- shown on the
13 top left at the first page, Application Number 61/077,728.
14 Do you see that?

15 A Yes.

16 Q And is this the provisional application that you
17 filed -- or strike that.

18 Is this the provisional application that iCharts
19 filed on July 2nd, 2008?

20 A I'm not an expert in these legal docs, but we
21 would say provisional... I don't know how to answer this.
22 So...

23 Q Sure. So if we go to the cover page of the '892
24 patent.

25 A Right.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

76

1 Q That Item 60.

2 A Yeah.

3 Q The 61/077,728, is the --

4 A Yeah, so yes.

5 Q -- provisional application --

6 A I assumed this one would be the provisional.

7 Q And if we go to page 45 of Exhibit 1013.

8 A Which is the provisional, right?

9 Q Yes.

10 A Mm-hmm.

11 Q Page 45 is the description of -- the written
12 description of the provisional; is that right?

13 A Yeah.

14 Q And it's a little over one page?

15 A Yes.

16 MR. MARINO: Objection; form.

17 BY MR. DUTTON:

18 Q The description's quite a bit less than the '892
19 patent; is that correct?

20 A Well, so we had a lot of, you know, pictures
21 (indecipherable utterance) and we relied heavily --

22 THE STENOGRAPHIC REPORTER: Pictures and what?

23 THE WITNESS: So we heavily relied on images and
24 screenshots from our actual product. So yeah, so it's a
25 combination of the description, plus the images and

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

77

1 screenshots we provided.

2 BY MR. DUTTON:

3 Q That's fair.

4 So there's figures in the provisional application
5 starting on page 54 of Exhibit 1013, right?

6 A Yes.

7 Q And going to the end, page 73.

8 A Yes.

9 Q And then the description -- the other -- like the
10 written description is a little over one page, pages 45
11 and 46, right?

12 A Yes.

13 Q Okay. So sorry to jump between documents. But
14 if we go back to the email chain with Jennifer Hayes.

15 A Mm-hmm.

16 Q And if we go to page 7, there's an email dated
17 August 15th. Do you see that?

18 A August 15th, yes.

19 Q And this is a little over a month after you
20 filed -- after iCharts filed the provisional?

21 A Yes.

22 Q And in the email -- well, you first email
23 Jennifer Hayes asking about the application, right?

24 A Yes.

25 Q And then Jennifer responds that she finished the

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

78

1 figures in claims of the application and is working on the
2 detailed description, right?

3 A Sorry, where do you see that?

4 Q So after your email on August 15th to Jennifer,
5 she responds --

6 A Yes.

7 Q -- also on August 15th at 8:08 p.m. Do you see
8 that?

9 A Yes.

10 Q And in that email, she indicated that she
11 finished the figures and the claims for the application
12 and is working on the detailed description, right?

13 A Yes.

14 Q So after you filed the provisional application,
15 more drafting was required; is that fair?

16 A After I filed the provisional, then the actual
17 application had to be drafted. Yes.

18 Q Why was that?

19 MR. MARINO: Objection; form.

20 THE WITNESS: I'm not a -- I'm not a, you know, patent
21 attorney. So... I -- there's a process that takes you
22 from the provisional to the full application. So... which
23 is drafting the right language, as you know.

24 BY MR. DUTTON:

25 Q There were -- there was more embodiments added to

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

79

1 the specification of the provisional application; is that
2 fair?

3 A We -- in the -- I'm assuming that everything
4 that's depicted in the -- in the final application was
5 provided and then drafted into -- into the final document.

6 Q So if you go to the email chain on page 6, on
7 August 21st, 2008, Jennifer provided a first draft of the
8 patent application, which led to the '892 patent; is that
9 right?

10 A On August 21st, yes.

11 Q And then there -- if you kind of flip through the
12 email chain after that, there was some back and forth
13 between you and Jennifer. Do you see that?

14 A Yeah, there's August 15th. There's August 5th.
15 There's July 31st. So yeah, I'm not sure what we're
16 trying to... yeah.

17 Q What was your recollection of what needed to get
18 done between when you received the first draft of the
19 application and when you -- when iCharts filed the
20 application that led to the '892 patent?

21 A So look, we were building the product because we
22 were racing towards releasing. And I had provided, you
23 know, my input, and whatever additional input
24 (indecipherable utterance) Jennifer needed, we provided.

25 THE STENOGRAPHIC REPORTER: I'm sorry, input what?

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

80

1 THE WITNESS: Whatever additional input was needed by
2 Jennifer, I provided based on what you can see here in the
3 communication. So I'm not sure what specifically it was,
4 but it's all kind of like -- it was a very fluid ongoing
5 process.

6 BY MR. DUTTON:

7 Q So there was information that you provided patent
8 counsel to add to the application for the nonprovisional
9 patent?

10 A Yeah, I guess so. Based on what she needed.
11 Right.

12 Q And do you recall what specifically you provided
13 that you wanted to be included in the nonprovisional
14 patent?

15 A I mean, you have what is written here. That's
16 what I have and what I recollect 17 years later. Is it
17 17? It's a long time, yeah.

18 Q So the '892 patent added some new figures; is
19 that correct?

20 A New figures as compared to what?

21 Q The provisional application.

22 A Let me check. So I would have to make kind of
23 like a page-by-page comparison to just be sure that I
24 answered correctly. So I'm sure you've checked that so
25 I'm sure you will let me know.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

81

1 Q Let's start with Figure 1.

2 A Okay.

3 Q Figure 1 of the '892 patent was a new figure that
4 you added to the nonprovisional, right?

5 A So it's a new figure that was not in the
6 nonprovisional. Yeah. It's a figure that was not in the
7 nonprovisional.

8 Q All right. And what is shown in Figure 1?

9 A A system diagram showing the underlying hardware
10 required to run the system.

11 Q All right. And Figure 2 of the '892 patent is
12 also new. It was not in the provisional application,
13 right?

14 A I did not see this figure in the provisional
15 application.

16 Q And then sorry, just to clarify the record, for
17 Figure 1, Figure 1 was not in the provisional application,
18 it was added to the nonprovisional application, right?

19 A That's what it looks like.

20 Q Okay. And the same thing for Figure 2, that was
21 added to the nonprovisional application?

22 A That's what it looks like.

23 Q And Figure 2 is -- shows -- Figure 2 also shows
24 the underlying hardware required to run the system?

25 A Figure 2 is a module diagram. Right. So it's,

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

82

1 you know, systems diagram. So it has -- shows a data
2 module, and -- so it focuses more on the system modules.

3 Q Okay. So the module diagram, which is Figure 2,
4 was added to the nonprovisional. It was not in the
5 provisional application?

6 A That's what it looks like.

7 Q And Figure 40B, if we could look at that figure.

8 A Yeah.

9 Q And this is the figure we looked at earlier that
10 showed the preset chart templates; is that right?

11 A It shows presets and chart types and essentially
12 the chart template, ability to select the chart template.

13 Q Okay. Does it also show a chart template pane?

14 A It shows chart templates, yes.

15 Q Are those located within a pane?

16 A Yes.

17 Q And Figure 40B of the '892 patent was added to
18 the nonprovisional, it was not in the provisional
19 application, right?

20 A I can double-check. But I'm assuming that
21 that's -- you've already done the analysis. So I'm
22 assuming that that's the case. So what we do have, for
23 example, this is the provisional, right? Yeah. So what
24 we do have, for example, in the provisional is on page --
25 I guess 61, chart templates.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

83

1 Q So what's shown on page 61 are generated charts,
2 right?

3 MR. MARINO: Objection; form.

4 THE WITNESS: Not necessarily. The way I'm reading
5 this, these are actually... so any chart that was an
6 existing chart, you could turn into a chart template,
7 right? So you had an existing -- I could save and make
8 any chart into a template. Right. So by definition, any
9 chart gallery would also constitute like a chart template
10 gallery. Because I can turn anything into a template.

11 You know, like today, you have in, you know,
12 documents in Word or whatever, I can save any document,
13 make that into a template. Same concept.

14 BY MR. DUTTON:

15 Q On page 61 of the provisional, the text on upper
16 right says, All your charts in one place. Would this be a
17 user interface of the chart portal, or the iCharts portal?

18 A This would -- if I -- I'm not certain anymore. I
19 would have to think about this. This could be both.
20 The -- they looked very similar. Right. This could be
21 both the -- your own personal charts. Right. Or this
22 could also be the actual portal. They look very similar,
23 right. At the end of the day, you see the button like new
24 iChart, find iChart?

25 So clicking on new iChart would then open the

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

84

1 studio to allow you to create a new chart.

2 Q Right. And this user interface shown in 61, you
3 agree is different from what is shown in Figure 40B of the
4 '892 provisional?

5 MR. MARINO: Objection; form.

6 THE WITNESS: So conceptually, one is clearly a
7 diagram. The other one is an actual closer implementation
8 look, right? So conceptually, they represent the same
9 thing.

10 BY MR. DUTTON:

11 Q Figure 40B in the '892 provisional has the preset
12 tab, and it also has like a data columns tab. Do you see
13 that?

14 A Yeah.

15 Q Would the data columns tab be -- like lead to
16 like a data pane?

17 A The data column would lead to a -- you know, page
18 where you would have all like the data columns, like you
19 probably know of pivot tables. Like it would allow you
20 to -- you know, it's a pane of various data elements and
21 that I can then, you know, drag and drop onto the chart
22 pane.

23 Q Okay. And the figure of the user interface on
24 page 61 of the provisional does not have a similar data
25 pane that allows to drag and drop, right?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

85

1 A That is correct.

2 Q So having panes for presets and data columns to
3 be able to drag and drop onto the chart was not in the
4 provisional application; is that right?

5 A Well, it is not graphically depicted, but for
6 example, conceptually on page 59, we describe a drag and
7 drop your chart in a few simple steps.

8 Q Is that dragging and dropping a generated chart
9 like on the board, could that refer to that functionality?

10 MR. MARINO: Objection; form.

11 You can answer.

12 THE WITNESS: So drag and drop would -- would, you
13 know, we would have referred to it at that time as the
14 studio, where you drag and drop the start chart on the
15 studio.

16 THE STENOGRAPHIC REPORTER: You said the start chart?

17 THE WITNESS: So we refer to it as typically a feature
18 of the studio where you drag and drop your chart inside
19 the studio which correlates to where it says create
20 iChart, the step before we publish.

21 BY MR. DUTTON:

22 Q So you would drag and drop the chart, but that's
23 not saying drag and drop data into a chart, right?

24 MR. MARINO: Objection; form.

25 THE WITNESS: Well, it's shortened, right? So you

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

86

1 choose your data source, and you drag and drop elements
2 into your chart in a few simple steps. It's kind of, you
3 know, shortened. But conceptually what is meant is you
4 drag and drop the elements to create your chart in a few
5 simple steps.

6 BY MR. DUTTON:

7 Q Okay. So it's your opinion that the concepts
8 were in the provisional application, and then -- but the
9 implementation is shown in Figure 40B of the
10 nonprovisional for the drag and drop?

11 A So the -- we had already created most of the
12 application well before that. Right. So we were -- what
13 accelerated us to file was that we had an upcoming launch
14 date, and we needed to get everything ready. So we had --
15 our actual implementation was well under way since quite
16 some time. So most elements were already, you know, fully
17 created.

18 Q Understand.

19 Was the implementation though shown, like
20 described or depicted in the provisional application?

21 A Yeah, so it was screenshots from our product,
22 right, in the provisional. Yeah, page 58, 57. All those
23 charts are examples from our product. Live product. And
24 if I may add, here's the provisional, right? Yeah. So
25 for example, actually, on page 62, here, you have exactly

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

87

1 what we're looking for, right? So they're the presets,
2 the chart types, data columns.

3 And that is actually what I was looking for.
4 That's the chart creation pane.

5 Q Got it.

6 A And that correlates to the one to the Figure 40B,
7 what we've been discussing earlier.

8 Q Okay. So for the implementation that's shown in
9 page 62, iCharts actually did differentiate between
10 presets and chart types, right?

11 A Yeah, so they are two different tabs that, you
12 know, you would select a chart type. Then you would
13 select the preset.

14 Q All right. If we can go back to your
15 declaration, if we start at paragraph 5, you have a
16 section about the background of -- a section titled,
17 Background and Road to Placing the Technology Online. Do
18 you see that?

19 A Yes.

20 Q All right. And you start kind of with that
21 background as having the idea of -- having an idea in
22 December 2006, right?

23 A Correct. Yes.

24 Q Was that idea the company of iCharts or the
25 system of iCharts?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

88

1 A The system -- ultimately, the core idea, exactly
2 as I wrote there, was yeah, you could use -- you could be
3 able to create interactive charts that could be, you know,
4 published and embedded on any website, and essentially,
5 what it allowed you to do would be to separate, which sort
6 of was part of the big kind of like, you know, concept is
7 until we came about creation and viewing interactivity was
8 all kind of like confuddled into one thing.

9 And at that moment I suddenly realized we could
10 separate those two things. And by separating those two
11 things and making the viewing piece distributable to the
12 publishing and embedding concept, that would be the
13 paradigm shift. That was the core idea that came to my
14 head at that time, that you could -- you know, we could
15 implement that.

16 Q And did you come up with that idea in Germany?

17 A Well, I was jogging along a beach. So yeah,
18 exactly.

19 Q Where was the beach?

20 A That's a good question. I have to -- I have to
21 look up -- I'm sure it's somewhere in the emails.
22 Somewhere in the Caribbean.

23 Q Okay. But not in the United States?

24 A It was not in the United States.

25 Q And then in paragraph 6 you determined that Flash

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

89

1 would be the best route for designing the architecture?

2 A At that time, Flash was the technology to be
3 used.

4 Q And you reached out to Tyron Montgomery who was a
5 Flash expert?

6 A Correct.

7 Q And did you reach out to Tyron Montgomery in
8 Germany?

9 A Yes.

10 Q And did you meet with Tyron in Germany?

11 A Yes.

12 Q To discuss the idea?

13 A Yes.

14 Q And then you provided Mr. Montgomery a PowerPoint
15 presentation describing the technology, right?

16 A Yes.

17 Q You were both in Germany at the time?

18 A Correct.

19 Q Okay. And then -- and then in paragraph 10, you
20 say, By March 29, 2007, Mr. Montgomery and I had conceived
21 of what would become iCharts and the '892 patent, right?

22 A Correct.

23 Q And was those ideas generated when you and
24 Mr. Montgomery were in Germany?

25 A Yeah, pretty much from the time that we started

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

90

1 to that time point, yes.

2 Q And then you reduced the -- to reduce the
3 invention of practice, you hired an India-based company
4 called Compassites?

5 A Compassites, yes.

6 Q Did they do all of their work for the reduction
7 of practice in India?

8 A Core development -- well, okay. I -- so in terms
9 of reduction to practice, ultimately -- and I'm a
10 layperson, right? So, you know, I haven't done, you know,
11 all that legal technicalities, but the core architecture
12 and all of that was done by Tyron and myself in Munich,
13 right. And we -- you know, we generated the
14 specifications that we then gave to Compassites to
15 basically on our behalf generate into code. Right.

16 So that coding piece was done in India. The, you
17 know, conceiving the architecture, everything, we did in
18 Munich.

19 Q Okay. And then at some point in time, iCharts
20 moved to the United States?

21 A Well, so we -- I incorporated iCharts in the
22 United States in I think February 2008. I had made a
23 determination that the best place to create this company
24 was in the United States. So we incorporated the company
25 then.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

91

1 Q Okay. Before February 2008, was any of the
2 development of iCharts' system performed in the United
3 States?

4 A I... no. I don't believe so. And I'm just --
5 I'm just trying to see if there's any nitpicking, I mean,
6 in terms of -- I was several times before that in the
7 United States, right, and so yeah, I could have well been
8 on a phone call. You know, I mean, we were around the
9 clock building our product.

10 So was I in the United States discussing with
11 Tyron the idea and the concept and -- before that?
12 100 percent, right. So yeah, parts of it, you know,
13 probably was done by me being here on the ground.

14 Q Do you recall sitting here today what specific
15 parts of the iCharts system was developed in the United
16 States?

17 A No.

18 Q And paragraph 21, you refer to testing in private
19 beta version of the prototype. Do you see that?

20 A Okay. Page 67, right? Yeah. Mm-hmm.

21 Q Now, was that testing performed in Germany?

22 A Yes. Let me actually update this. Because this
23 was already July 10th, 2008. So I can't -- I can't, you
24 know, explicitly say because at that time, we were both in
25 Germany as well as the United States preparing for the

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

92

1 launch. Right. And so I don't exactly recall where I was
2 physically at that time.

3 We had a -- yeah, so...

4 Q Do you recall the users that were the ones that
5 were testing the prototype?

6 A I mean, we had a launch customer that was based
7 on Germany. But at that time, I was preparing for the
8 (indecipherable utterance) TechCrunch launch.

9 THE STENOGRAPHIC REPORTER: Preparing for the what?

10 THE WITNESS: TechCrunch launch in the United States.
11 And so I don't precisely recall that, no.

12 MR. DUTTON: I think now would be a good time for a
13 short break.

14 (Recess taken.)

15 BY MR. DUTTON:

16 Q Mr. Duncker, you were the prior CEO of iCharts,
17 right?

18 A Yes.

19 Q Do you have a current role at iCharts?

20 MR. MARINO: Objection; form.

21 THE WITNESS: So a current role, no.

22 BY MR. DUTTON:

23 Q Okay. You're not employed by iCharts?

24 A So --

25 MR. MARINO: Objection; form.

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

93

1 THE WITNESS: Yeah, which iCharts, right? So the
2 original iCharts, no. Not in the original iCharts that
3 was formed.

4 BY MR. DUTTON:

5 Q Okay. So there is initially an iCharts Inc. that
6 was formed?

7 A February -- February, whatever it was, 2008, we
8 formed iCharts Inc.

9 Q And then at some point, there became an iCharts
10 LLC?

11 A Yes.

12 Q Okay. Are you -- have a current role or are
13 employed by iCharts LLC?

14 A I am a partner. I am not employed.

15 Q When you say partner, does that mean you are an
16 equity owner?

17 A Yes.

18 Q And what percent equity do you have in iCharts
19 LLC?

20 MR. MARINO: Objection; scope.

21 But you can answer.

22 THE WITNESS: I'm not sure that I need to answer that.
23 My understanding is that this is limited to my
24 declaration. So I'm not sure -- if you can point me to
25 where we discuss this in my declaration, then I'm happy to

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

94

1 comment that. But not sure what that has to do with my
2 declaration.

3 BY MR. DUTTON:

4 Q So I --

5 MR. MARINO: Yeah, I'm not instructing you not to
6 answer. I'm just objecting on scope.

7 So you can answer that question.

8 THE WITNESS: Do I have to answer this question? I'm
9 not sure I want to. Sorry, my question is what my
10 percentage is?

11 BY MR. DUTTON:

12 Q What percentage of equity do you own in iCharts
13 LLC?

14 A I'm sorry, I'd like to confer with my counsel to
15 why I would have to disclose that. I'm not sure that I
16 have to.

17 MR. DUTTON: Counsel, I think we're entitled to know.

18 MR. MARINO: Yeah, you can answer that question. The
19 problem is we don't have a protective order in place. And
20 that's information that he would want to designate under a
21 protective order.

22 So... are you willing to stipulate that you'll
23 agree to a protective order so I can let him answer? And
24 it can be a protective order that's presently in the
25 underlying case -- but it is obviously sensitive for

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

95

1 business information.

2 MR. DUTTON: Yeah, I think we can agree to a default
3 protective order for the transcript.

4 MR. MARINO: So we'll designate this as under the
5 default protective order in the case.

6 THE WITNESS: So I can answer?

7 MR. MARINO: Now you can answer.

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 MR. MARINO: All right. So the rest of the transcript
23 will not be designated unless I say otherwise.

24 MR. DUTTON: Okay. Thank you.

25

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

96

1 BY MR. DUTTON:

2 Q Yeah, Mr. Duncker, thanks for your time today. I
3 have no further questions at this time.

4 I will pass the witness, subject to redirect.

5 MR. MARINO: Thank you. Recross.

6 MR. DUTTON: Recross, yeah.

7 EXAMINATION

8 BY MR. MARINO:

9 Q All right. Good afternoon, Mr. Duncker. I just
10 have a couple of follow-up questions to clarify some of
11 the things you said. If you could turn to page 20 of your
12 declaration, Exhibit 2200. Okay. If you look at the
13 bottom half of that page, you were asked some questions
14 about an SWF file. Do you recall that?

15 A Yes.

16 Q Now, when you -- I believe you were asked whether
17 that SWF file was self-contained. Do you recall that?

18 A Yes.

19 Q Was that true of that specific file?

20 MR. DUTTON: Objection; form.

21 THE WITNESS: Of that specific file? Yes.

22 BY MR. MARINO:

23 Q Is it true of all SWF files just because they're
24 SWF files?

25 A I... I would... all... yeah. I would say so.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

97

1 Q Okay. Now, if you can look -- that's all I have
2 on that page.

3 If you can look at Figure 30 of the patent.

4 A Figure 30 of the patent.

5 Q Which is Exhibit 1001.

6 So spent a long time talking about that figure.
7 This is the one that talks about publishing that, and all
8 that. Do you recall that testimony?

9 A Yes.

10 Q Okay. So is download an intermediate step to
11 either embedding or publishing an iChart?

12 A It's a separate step.

13 Q So after you've downloaded a file, you could also
14 embed it into another file, right?

15 A Absolutely.

16 Q And you could also after you download a file,
17 publish it on a website?

18 A Yes.

19 Q Now, and I believe you testified that subsequent
20 to this figure being generated in the product itself, you
21 differentiated between embedding and downloading; is that
22 correct?

23 A Yes.

24 Q If you can turn to page -- to Figure 40A, B, and
25 C. If you can look at the bottom of the image, buttons

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

98

1 that say, Publish, share and download. Do you see that?

2 A Yes.

3 Q Is that what you were referring to?

4 A 100 percent.

5 Q Okay. So at least in figures 40A, B, and C,
6 there are separate interfaces for publishing versus
7 sharing versus downloading?

8 A Mm-hmm.

9 MR. DUTTON: Objection; form.

10 THE WITNESS: Yes.

11 BY MR. MARINO:

12 Q By the way, and I think I may have slipped on
13 that terminology as well. I believe you said that you can
14 embed a file into -- and I believe the testimony you gave
15 was into a PDF or a PowerPoint. Do you recall that?

16 A Yes.

17 Q But what did you mean by that, would you actually
18 embed the whole file or the contents of the file?

19 A I would embed the Flash file into the PDF.

20 Q Okay. Not the contents of the Flash file?

21 A No, no. The (indecipherable utterance) actual
22 object.

23 Q Actual object.

24 THE STENOGRAPHIC REPORTER: The actual what?

25 THE WITNESS: The actual object.

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

99

1 BY MR. MARINO:

2 Q Now, you were also asked a number of questions
3 about figures in the nonprovisional application like the
4 patent itself, that are not in the provisional
5 application. Do you recall that?

6 A Yes.

7 Q And for one of them, I will -- I think the
8 question was about Figure 40B with the nonprovisional. I
9 believe you testified that page 61 of the nonprovisional
10 is showing the same thing as Figure 40B of the
11 nonprovisional --

12 MR. DUTTON: Objection; mischaracterizes testimony.

13 THE WITNESS: That's what I initially said.

14 BY MR. MARINO:

15 Q Okay.

16 A But then I mentioned that it's really page 62
17 that correlates to Figure 40B.

18 Q What did you mean by correlates?

19 A The one is the implementation of the other.

20 Q Okay.

21 A So in -- yeah.

22 Q Okay. And just to be clear, I believe you also
23 testified that the figures in the provisional applications
24 are screenshots taken from operation of the products; is
25 that correct?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

100

1 A (Indecipherable utterance) 100 percent.

2 MR. DUTTON: Objection.

3 THE STENOGRAPHIC REPORTER: I'm sorry, I didn't
4 hear --

5 THE WITNESS: 100 percent.

6 THE STENOGRAPHIC REPORTER: Thank you.

7 BY MR. MARINO:

8 Q Okay. And so as of the date, I believe we
9 established was July 2nd, the provisional was filed, had
10 you implemented all of the code that's shown in the
11 figures of the provisional?

12 MR. DUTTON: Objection; scope.

13 THE WITNESS: Yes.

14 MR. MARINO: Okay. I think that's all I have.

15 MR. DUTTON: Can we take five minutes?

16 (Recess taken.)

17 FURTHER EXAMINATION

18 BY MR. DUTTON:

19 Q Mr. Duncker, you were asked whether you
20 implemented code shown in the figures of the provisional.
21 Do you recall that?

22 A Sorry, say that -- repeat that question?

23 Q You were asked by iCharts's counsel whether you
24 implemented code shown in the figures of the provisional.
25 Do you recall that?

PUBLIC VERSION

Transcript of Seymour Duncker

Conducted on October 10, 2025

101

1 MR. MARINO: Objection; form.

2 But you can answer.

3 THE WITNESS: Sorry, that iCharts -- you mean... oh.

4 So by the -- so I think the question was with regards to

5 the -- to the Flash files, the SWF. I'm confused. I...

6 BY MR. DUTTON:

7 Q Right. So counsel directed -- iCharts's counsel

8 directed you to the figures of the provisional and asked

9 you whether you had implemented any of the code at the

10 time of filing the provisional application --

11 A Yes, correct, yeah.

12 Q -- do you recall that?

13 A Yes.

14 THE STENOGRAPHIC REPORTER: You said provisional or

15 non --

16 MR. DUTTON: Provisional.

17 THE STENOGRAPHIC REPORTER: Thank you.

18 BY MR. DUTTON:

19 Q And you didn't submit any of that code in this

20 proceeding, correct?

21 A Sorry, in this proceeding? So actually, you mean

22 as part of the entire case?

23 Q Let me clarify. For this inter partes review,

24 you did not submit any of that code for your declaration,

25 correct?

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

102

1 A Correct.

2 Q And you don't rely on any of that code for the
3 evidence that you cite for conception in this IPR,
4 correct?

5 MR. MARINO: Objection; form.

6 But you can answer.

7 THE WITNESS: I don't believe so. Yes.

8 BY MR. DUTTON:

9 Q Okay. And then during any of the breaks today,
10 did you talk to counsel about the substance of your
11 testimony?

12 A No. You're not supposed to, right?

13 Q Yeah.

14 I have no further questions. I appreciate your
15 time today.

16 A Sure.

17 MR. MARINO: No redirect.

18 (WHEREUPON THE DEPOSITION WAS

19 CONCLUDED AT 2:03 P.M.)

20

21

22

23

24

25

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

103

1 Please be advised I have read the
2 foregoing deposition, pages 1 through
105, inclusive.

3 I hereby state there are:

4

5

6

(Check one) _____ no corrections

7

8

_____ corrections per attached

9

10

SEYMOUR DUNCKER

11

12

13

14

15

16

17

18

19

--oOo--

20

21

22

23

24

25

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

104

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

WITNESS'S CHANGES OR CORRECTIONS

NOTE: If you are adding to your testimony, print the exact words you want to add. If you are deleting from your testimony, print the exact words you want to delete. Specify with "Add" or "Delete" and sign this form.

Deposition of: SEYMOUR DUNCKER
Case Title: TABLEAU V. ICHARTS
Date of Deposition: OCTOBER 10, 2025

I, _____ have
the following corrections to make to my deposition:

Page Line Change/Add/Delete

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

105

CERTIFICATE OF SHORTHAND REPORTER/STENOGRAPHER

I, Christa Yan, Certified Shorthand/Stenographic Reporter within and for the State of California do hereby certify:

That Seymour Duncker, the Witness whose deposition is hereinbefore set forth, was duly sworn by me before the commencement of such deposition and that such deposition was taken before me and is a true record of the testimony given by such witness.

I further certify that both parties were represented by counsel at the deposition.

I further certify that the deposition of Seymour Duncker, occurred personally at the offices of Womble Bond Dickinson on October 10, 2025, commencing at 9:34 a.m., to 2:03 p.m.

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

IN WITNESS WHEREOF, I have hereunto set my hand this 22nd day of October 2025.



CERTIFIED SHORTHAND/STENOGRAPHIC REPORTER
IN AND FOR THE STATE OF CALIFORNIA

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

106

A			
ability	act	additional	47:13, 54:2,
10:11, 15:20,	10:25, 15:19,	15:22, 27:24,	56:3, 56:14,
25:13, 36:24,	15:20, 31:17,	28:13, 28:15,	62:13, 63:19,
44:5, 51:8,	33:13, 46:13	38:20, 68:21,	72:8, 80:4,
51:18, 61:21,	action	68:25, 79:23,	81:8, 81:11,
82:12	44:12, 46:7,	80:1	83:16, 84:18,
able	49:21, 59:24,	adds	86:22, 87:14,
13:14, 14:3,	60:12, 105:20,	56:13	87:20, 88:8,
14:5, 22:9,	105:22	advised	90:6, 90:11,
25:15, 47:11,	active	103:1	90:12, 95:22,
48:19, 50:19,	33:18	after	96:9, 96:23,
53:4, 55:11,	acts	17:2, 19:18,	96:25, 97:1,
85:3, 88:3	62:20	20:10, 32:4,	97:7, 100:10,
about	actual	34:11, 54:24,	100:14
7:10, 17:15,	23:18, 27:9,	56:7, 60:15,	allow
21:22, 23:14,	27:10, 30:19,	63:7, 63:15,	10:23, 31:4,
23:19, 25:25,	38:12, 38:19,	75:8, 77:19,	41:3, 84:1,
26:17, 43:4,	38:22, 39:24,	77:20, 78:4,	84:19
66:14, 74:23,	58:13, 59:20,	78:14, 78:16,	allowed
77:23, 83:19,	60:14, 60:22,	79:12, 97:13,	17:23, 39:20,
87:16, 88:7,	61:13, 61:14,	97:16	88:5
96:14, 97:6,	63:3, 63:18,	afternoon	allows
97:7, 99:3,	70:8, 76:24,	96:9	12:21, 15:17,
99:8, 102:10	78:16, 83:22,	again	16:15, 32:23,
above	84:7, 86:15,	6:10, 10:1,	36:16, 48:17,
38:9, 38:10,	98:21, 98:23,	13:1, 20:8,	51:12, 53:1,
44:15, 74:19	98:24, 98:25	41:17, 51:5,	84:25
absence	actually	58:21, 60:6,	alone
9:12, 42:24,	10:18, 26:1,	72:15	21:4, 21:9,
43:9	40:21, 47:18,	against	21:16, 22:5,
absolutely	48:7, 51:6,	36:1	25:3, 25:12
63:10, 97:15	59:22, 63:19,	agarwal	along
accelerated	72:2, 83:5,	2:21, 5:15,	59:19, 88:17
86:13	86:25, 87:3,	95:16	already
access	87:9, 91:22,	agree	32:1, 37:8,
27:24	98:17, 101:21	18:23, 19:1,	37:25, 59:23,
accessible	add	48:22, 64:19,	60:20, 82:21,
49:8, 49:25,	28:11, 71:6,	64:22, 64:25,	86:11, 86:16,
50:6, 50:7,	80:8, 86:24,	69:25, 73:21,	91:23
50:13	104:4, 104:6,	84:3, 94:23,	also
accordance	104:15	95:2	2:20, 11:20,
4:7	added	all	19:5, 19:6,
according	78:25, 80:18,	14:10, 22:13,	25:19, 25:22,
25:11, 25:18	81:4, 81:18,	26:4, 26:20,	35:24, 44:4,
accurate	81:21, 82:4,	27:2, 27:15,	44:5, 44:6,
6:11, 12:16	82:17	27:18, 28:10,	45:9, 49:2,
	adding	28:22, 33:4,	49:13, 54:25,
	104:3	35:12, 42:5,	67:1, 67:8,

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

107

<p>69:20, 78:7, 81:12, 81:23, 82:13, 83:9, 83:22, 84:12, 97:13, 97:16, 99:2, 99:22 always 31:10 amount 65:12 analysis 82:21 another 6:6, 13:9, 32:8, 42:4, 52:11, 52:25, 56:13, 73:16, 97:14 answer 5:25, 6:7, 6:17, 6:21, 6:22, 7:3, 9:25, 12:14, 16:7, 16:22, 25:6, 33:11, 58:19, 59:17, 62:25, 64:7, 75:21, 85:11, 93:21, 93:22, 94:6, 94:7, 94:8, 94:18, 94:23, 95:6, 95:7, 101:2, 102:6 answered 80:24 answers 6:3, 6:10 any 11:2, 11:4, 17:19, 25:8, 32:20, 32:24, 35:2, 45:2, 46:20, 51:16, 52:5, 53:1, 53:19, 54:15, 62:8, 72:13, 72:16, 83:5, 83:8, 83:12,</p>	<p>88:4, 91:1, 91:5, 101:9, 101:19, 101:24, 102:2, 102:9, 105:19, 105:21 anybody 16:17, 30:22, 50:17 anymore 83:18 anything 28:2, 28:14, 35:3, 40:19, 52:13, 83:10 anywhere 10:12, 10:16 apologies 37:12 appeal 1:2 appear 17:6, 30:21, 33:19, 60:18 appearance 5:12 appearances 2:1 appeared 4:5 application 8:11, 60:16, 61:1, 62:13, 62:18, 63:8, 75:5, 75:9, 75:12, 75:13, 75:16, 75:18, 76:5, 77:4, 77:23, 78:1, 78:11, 78:14, 78:17, 78:22, 79:1, 79:4, 79:8, 79:19, 79:20, 80:8, 80:21, 81:12, 81:15, 81:17, 81:18, 81:21, 82:5, 82:19, 85:4, 86:8,</p>	<p>86:12, 86:20, 99:3, 99:5, 101:10 applications 99:23 appreciate 9:21, 102:14 approximately 6:24 architecture 73:12, 73:19, 89:1, 90:11, 90:17 around 36:4, 36:20, 73:7, 74:20, 91:8 arranged 74:12 arrow 36:14, 36:19, 40:7, 40:11, 49:2, 52:11, 52:23, 52:25 artifact 46:14 asked 96:13, 96:16, 99:2, 100:19, 100:23, 101:8 asking 10:7, 10:17, 77:23 aspect 20:18, 24:3, 24:5, 24:8, 24:21, 26:1, 63:21 aspects 17:13, 61:18 asserted 7:11 associated 47:10 assume 6:17 assumed 76:6</p>	<p>assuming 72:9, 79:3, 82:20, 82:22 attached 103:10 attention 18:12 attorney 78:21, 105:21 attorney-at-law 2:4, 2:5, 2:13, 2:14 audible 6:9 august 26:14, 77:17, 77:18, 78:4, 78:7, 79:7, 79:10, 79:14 automatic 50:7 automatically 33:7, 50:15 available 11:1, 17:8, 17:13, 30:22, 33:23, 52:15 aware 28:6, 40:19</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>back 12:6, 13:3, 23:12, 25:24, 29:24, 32:18, 35:11, 46:24, 53:7, 66:13, 77:14, 79:12, 87:14 background 87:16, 87:17, 87:21 bad 50:10 bar 18:1, 21:25, 22:12 based 80:2, 80:10,</p>
---	---	--	---

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

108

<p>92:6 basic 18:10, 22:10 basically 11:8, 17:12, 18:2, 20:6, 33:4, 39:22, 40:11, 47:4, 49:7, 49:10, 50:25, 53:20, 54:17, 57:17, 90:15 beach 88:17, 88:19 became 93:9 because 10:2, 14:3, 32:10, 44:11, 53:24, 55:3, 57:2, 58:11, 59:1, 61:17, 64:8, 64:9, 64:24, 72:2, 72:3, 79:21, 83:10, 91:22, 91:24, 96:23 become 89:21 been 5:21, 7:14, 26:4, 56:19, 68:14, 73:25, 87:7, 91:7 before 1:2, 4:3, 5:7, 5:21, 7:3, 13:1, 16:10, 16:18, 19:4, 19:17, 22:20, 58:8, 62:17, 62:18, 66:7, 66:13, 85:20, 86:12, 91:1, 91:6, 91:11, 105:7, 105:9 beginning 39:2</p>	<p>behalf 5:2, 5:8, 90:15 beholder 63:25 being 5:2, 41:12, 42:1, 47:11, 60:4, 91:13, 97:20 belief 47:9, 47:17 believe 13:1, 27:11, 27:20, 28:9, 28:12, 36:22, 43:22, 46:23, 58:24, 60:21, 61:5, 67:5, 67:18, 68:9, 68:11, 71:16, 91:4, 96:16, 97:19, 98:13, 98:14, 99:9, 99:22, 100:8, 102:7 below 72:16 best 89:1, 90:23 beta 91:19 between 6:6, 7:6, 13:6, 13:9, 14:17, 20:4, 23:22, 29:25, 31:14, 40:7, 63:4, 77:13, 79:13, 79:18, 87:9, 97:21 big 88:6 billing 63:18 bit 8:25, 51:5, 76:18 blood 105:20</p>	<p>blue 40:14, 40:16, 40:19, 71:17 board 1:2, 85:9 bond 2:12, 5:14, 105:16 both 12:7, 12:10, 19:20, 36:25, 41:20, 45:17, 83:19, 83:21, 89:17, 91:24, 105:12 bottom 47:14, 47:17, 48:10, 53:8, 74:8, 96:13, 97:25 box 30:13, 30:14, 36:4, 36:11, 36:21 boxes 59:8, 71:17 branch 47:14, 49:1, 53:8, 66:3 branches 47:4 break 6:24, 6:25, 7:3, 35:7, 65:18, 65:23, 66:10, 66:13, 92:13 breaking 65:17 breaks 102:9 browser 55:20 build 11:9, 54:2 building 48:3, 55:23, 63:11, 65:11,</p>	<p>79:21, 91:9 built 22:16, 41:1, 41:18, 49:13, 51:6, 57:10, 58:7, 58:14, 59:10, 59:20, 62:17 burden 27:22 business 95:1 button 33:18, 52:2, 83:23 buttons 97:25</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>c 72:24 california 2:16, 4:3, 4:5, 4:8, 105:4, 105:32 call 91:8 called 5:2, 20:1, 30:18, 31:11, 33:15, 41:3, 90:4 came 24:6, 34:11, 88:7, 88:13 can't 24:5, 24:8, 24:9, 91:23 canvas 22:9, 31:7, 50:19, 69:19 capabilities 21:2 capability 10:24, 12:8, 51:13 caribbean 88:22</p>
---	--	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

109

case 1:8, 7:5, 32:9, 36:22, 40:23, 67:5, 82:22, 94:25, 95:5, 101:22, 104:10 cause 4:6 center 40:3, 40:12 ceo 92:16 certain 39:8, 48:1, 48:6, 83:18 certificate 3:11, 105:1 certified 4:4, 105:3, 105:31 certify 105:4, 105:12, 105:14, 105:19 cetera 18:20, 19:3 chain 77:14, 79:6, 79:12 challenge 7:11 change 104:15 changed 61:12, 64:14 changes 3:10, 104:1 charts 11:18, 17:18, 18:3, 19:13, 31:5, 32:2, 32:3, 33:7, 37:13, 37:23, 37:25, 38:2, 57:22, 57:23, 83:1, 83:16, 83:21, 86:23, 88:3 check 12:18, 12:19,	60:8, 80:22, 103:8 checked 80:24 choose 16:17, 37:9, 39:23, 86:1 christa 1:31, 4:4, 105:3 citation 45:15 cite 29:6, 29:9, 29:16, 34:5, 35:1, 35:2, 35:18, 37:5, 42:12, 45:2, 46:20, 52:5, 68:24, 70:9, 70:22, 71:4, 102:3 cited 27:25, 28:7, 28:15, 28:18, 34:20, 34:23, 65:1 claim 9:17, 9:22, 29:3, 68:22, 68:25, 69:24, 70:3, 70:10 claimed 8:19 claims 8:16, 8:17, 10:1, 10:14, 58:21, 58:22, 58:25, 78:1, 78:11 clarified 59:21, 63:21 clarify 6:15, 73:21, 81:16, 96:10, 101:23 cleaned 58:10	clear 6:6, 6:13, 38:10, 64:17, 69:21, 71:9, 72:19, 73:3, 99:22 clearly 24:9, 24:19, 48:4, 58:11, 58:21, 59:22, 61:15, 62:19, 63:4, 63:12, 65:5, 84:6 click 51:22, 52:6, 52:8, 52:19, 55:16 clicked 30:20 clicking 83:25 client 5:16, 73:7 clients 73:4 clock 91:9 close 65:22 closer 84:7 code 4:8, 10:21, 11:1, 15:7, 15:9, 15:13, 15:20, 15:21, 16:4, 29:17, 30:23, 32:7, 32:15, 32:16, 32:19, 32:21, 34:8, 45:3, 45:6, 45:8, 45:9, 45:11, 45:18, 45:21, 45:24, 45:25, 46:3, 46:5, 46:8, 46:9, 46:10, 46:11,	46:12, 46:15, 46:16, 46:17, 48:16, 49:4, 49:9, 49:11, 50:3, 50:16, 50:18, 50:22, 50:25, 51:4, 51:14, 51:15, 51:17, 51:18, 51:22, 52:2, 52:7, 52:10, 52:14, 52:25, 53:4, 53:22, 53:24, 53:25, 54:2, 54:4, 54:6, 54:21, 55:13, 65:10, 66:3, 90:15, 100:10, 100:20, 100:24, 101:9, 101:19, 101:24, 102:2 coding 90:16 colors 18:19, 19:2, 23:17 column 18:12, 23:1, 84:17 columns 20:20, 84:12, 84:15, 84:18, 85:2, 87:2 com 2:9, 2:17 combination 19:20, 19:22, 20:9, 20:16, 24:2, 24:10, 24:12, 24:15, 31:3, 31:21, 43:23, 76:25 combined 30:9, 30:19, 31:10 combining 41:18
--	--	--	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

110

<p>come 88:16</p> <p>comes 51:9</p> <p>coming 27:2</p> <p>commencement 105:8</p> <p>commencing 105:16</p> <p>comment 94:1</p> <p>communication 27:7, 80:3</p> <p>company 87:24, 90:3, 90:23, 90:24</p> <p>compared 80:20</p> <p>comparison 80:23</p> <p>compassites 90:4, 90:5, 90:14</p> <p>complete 20:19, 60:23</p> <p>completed 54:2</p> <p>component 12:6, 12:7, 13:4, 21:19, 29:12, 40:25, 41:5</p> <p>components 12:5, 13:2, 23:8, 31:5, 31:17, 56:14</p> <p>comprising 8:19</p> <p>computer 8:19, 32:24, 56:3</p> <p>conceived 89:20</p> <p>conceiving 90:17</p> <p>concept 8:16, 15:1,</p>	<p>41:13, 61:14, 64:11, 83:13, 88:6, 88:12, 91:11</p> <p>conception 26:22, 26:25, 27:15, 27:19, 27:22, 28:7, 28:18, 29:7, 35:19, 38:24, 65:1, 102:3</p> <p>concepts 59:21, 63:4, 64:18, 71:12, 86:7</p> <p>conceptually 84:6, 84:8, 85:6, 86:3</p> <p>conclude 63:23</p> <p>concluded 102:19</p> <p>confer 94:14</p> <p>configuration 20:7</p> <p>configured 8:20, 8:21, 8:22, 9:2, 9:4, 9:7, 9:18, 29:1, 34:2, 42:9, 42:20, 43:5, 58:22</p> <p>confirm 35:21</p> <p>conflate 64:10, 64:13</p> <p>confuddled 88:8</p> <p>confused 8:15, 64:4, 101:5</p> <p>confusing 61:17, 64:8, 64:22, 64:24</p> <p>connected 13:14</p> <p>connectivity 13:13</p>	<p>consecutive 39:21</p> <p>consider 19:20, 20:9, 25:17, 46:1, 61:20</p> <p>considered 46:2, 62:13</p> <p>consistent 60:4</p> <p>constitute 31:17, 62:10, 83:9</p> <p>constitutes 12:8, 40:25, 41:5, 41:17, 49:16, 49:20</p> <p>construct 73:4, 73:5</p> <p>constructed 54:20, 54:24, 55:25, 56:12, 57:9</p> <p>constructing 56:1</p> <p>constructs 73:10</p> <p>contained 22:12, 44:6</p> <p>contains 44:5</p> <p>content 16:14, 37:14, 37:18</p> <p>contents 98:18, 98:20</p> <p>context 10:17, 38:20</p> <p>continues 33:6</p> <p>copy 38:17, 53:4</p> <p>core 49:12, 50:2, 88:1, 88:13, 90:8, 90:11</p> <p>correct 7:25, 8:5, 8:6,</p>	<p>11:25, 14:12, 19:10, 20:2, 26:10, 26:16, 28:19, 29:15, 29:18, 31:22, 31:25, 36:3, 36:13, 37:22, 39:13, 41:24, 42:11, 42:16, 43:21, 43:25, 44:3, 44:24, 45:1, 45:16, 45:20, 46:19, 47:3, 47:6, 48:25, 52:24, 53:13, 55:5, 61:3, 66:6, 66:8, 70:25, 71:19, 72:11, 73:14, 73:19, 73:20, 73:23, 73:24, 74:7, 75:5, 76:19, 80:19, 85:1, 87:23, 89:6, 89:18, 89:22, 95:19, 97:22, 99:25, 101:11, 101:20, 101:25, 102:1, 102:4</p> <p>corrections 3:10, 103:8, 103:10, 104:1, 104:14</p> <p>correctly 80:24</p> <p>corrects 74:13</p> <p>correlates 85:19, 87:6, 99:17, 99:18</p> <p>could 8:24, 11:5, 11:20, 13:22, 13:24, 15:22, 17:9, 18:3, 18:10, 18:12, 19:8, 22:10,</p>
---	--	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

111

26:20, 27:25, 31:6, 31:7, 32:5, 32:14, 33:6, 39:7, 39:9, 39:20, 39:24, 44:5, 45:12, 48:20, 50:11, 51:14, 51:22, 58:6, 63:2, 64:3, 69:16, 69:19, 69:20, 82:7, 83:6, 83:7, 83:19, 83:20, 83:22, 85:9, 88:2, 88:3, 88:9, 88:14, 91:7, 96:11, 97:13, 97:16 couldn't 63:17 counsel 5:12, 6:20, 74:6, 75:8, 80:8, 94:14, 94:17, 100:23, 101:7, 102:10, 105:13 couple 34:11, 49:6, 96:10 court 6:2 cover 74:25, 75:23 create 10:11, 10:23, 18:3, 31:5, 31:8, 40:7, 40:13, 69:17, 69:20, 84:1, 85:19, 86:4, 88:3, 90:23 created 19:18, 22:9, 27:12, 27:13, 59:18, 63:15, 86:11, 86:17	creates 33:15 creating 65:8, 70:7 creation 14:6, 39:22, 40:4, 87:4, 88:7 csr 1:31 current 25:11, 92:19, 92:21, 93:12 customer 92:6 customize 25:15 cut 65:20 <hr/> <div style="text-align: center;">D</div> <hr/> data 8:20, 9:5, 9:6, 9:18, 9:19, 11:9, 11:23, 13:6, 13:15, 13:17, 13:18, 14:11, 14:24, 28:25, 29:1, 29:10, 29:12, 29:13, 29:17, 29:20, 29:25, 31:6, 35:25, 36:6, 37:15, 37:19, 40:7, 43:19, 44:2, 69:25, 70:4, 70:5, 70:6, 70:11, 82:1, 84:12, 84:15, 84:16, 84:17, 84:18, 84:20, 84:24, 85:2, 85:23, 86:1, 87:2 database 14:9, 49:9 date 86:14, 100:8,	104:11 dated 77:16 day 4:1, 4:2, 75:7, 83:23, 105:27 days 61:7 dc 2:7 december 87:22 decided 32:4 decision 33:18 declaration 26:7, 26:8, 26:14, 26:18, 27:5, 27:14, 28:8, 41:22, 44:14, 68:20, 87:15, 93:24, 93:25, 94:2, 96:12, 101:24 default 95:2, 95:5 define 69:12 definition 69:21, 83:8 delete 104:6, 104:7, 104:15 deleting 104:5 demonstrate 28:3 dependent 69:24 depict 70:4 depicted 19:14, 30:12, 79:4, 85:5, 86:20 deposed 5:21	deposition 1:21, 102:18, 103:2, 104:9, 104:11, 104:14, 105:6, 105:8, 105:13, 105:14 describe 8:17, 10:3, 27:13, 85:6 described 8:8, 10:14, 55:22, 86:20 describes 10:2, 11:8 describing 12:17, 27:8, 89:15 description 18:23, 38:9, 38:10, 39:1, 40:10, 41:1, 59:3, 76:11, 76:12, 76:25, 77:9, 77:10, 78:2, 78:12 description's 76:18 design 17:24, 17:25, 27:1, 27:2, 39:24 designate 94:20, 95:4 designated 95:23 designing 89:1 detailed 78:2, 78:12 details 41:23, 49:10 determination 90:23 determine 49:7 determined 88:25 developed 31:12, 91:15
---	--	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

112

development 90:8, 91:2 diagram 11:8, 14:14, 14:21, 29:12, 30:3, 38:6, 39:10, 40:1, 41:14, 42:4, 53:6, 53:7, 58:1, 58:9, 59:18, 60:5, 60:7, 60:8, 61:13, 62:16, 62:22, 73:20, 81:9, 81:25, 82:1, 82:3, 84:7 diagrams 63:2 dialogue 57:17 dickinson 2:12, 5:14, 105:16 different 48:20, 57:3, 58:8, 61:18, 84:3, 87:11 differentiate 87:9 differentiated 20:4, 97:21 difficulty 22:14 direct 18:12 directed 10:9, 101:7, 101:8 disclose 94:15 disclosed 28:3 disconnect 55:8 discover 50:19, 51:8, 51:9, 51:18 discuss 89:12, 93:25	discussed 58:8, 59:23 discussing 87:7, 91:10 disentangled 61:16, 63:6, 63:15 display 32:3 dispute 7:6 distinction 23:22 distinguish 31:13 distinguishing 22:15 distributable 88:11 distribute 15:23, 47:11, 73:9 distribution 16:14 docs 75:20 document 7:20, 7:22, 9:9, 26:6, 27:7, 27:11, 27:12, 33:5, 36:18, 38:19, 42:22, 43:7, 47:21, 48:19, 56:2, 65:4, 74:3, 79:5, 83:12 documents 11:20, 26:22, 27:8, 28:14, 28:15, 29:6, 38:24, 42:13, 44:25, 51:21, 57:15, 64:25, 77:13, 83:12 done 79:18, 82:21, 90:10, 90:12, 90:16, 91:13	double-check 82:20 download 32:6, 36:14, 36:16, 36:19, 36:24, 47:18, 48:5, 48:8, 48:11, 58:4, 58:11, 58:12, 58:24, 59:4, 59:14, 59:23, 60:2, 61:16, 61:18, 65:5, 65:15, 97:10, 97:16, 98:1 downloaded 37:3, 66:18, 97:13 downloading 47:25, 48:12, 48:22, 57:23, 58:15, 60:11, 61:9, 62:4, 62:5, 62:8, 62:11, 62:19, 62:23, 63:7, 63:16, 63:23, 64:4, 64:14, 64:20, 65:1, 65:8, 66:14, 97:21, 98:7 draft 79:7, 79:18 drafted 78:17, 79:5 drafting 78:15, 78:23 drag 31:6, 31:7, 84:21, 84:25, 85:3, 85:6, 85:12, 85:14, 85:18, 85:22, 85:23, 86:1, 86:4, 86:10 dragging 85:8 drawn 36:4, 36:23	drop 31:6, 31:7, 84:21, 84:25, 85:3, 85:7, 85:12, 85:14, 85:18, 85:22, 85:23, 86:1, 86:4, 86:10 dropping 85:8 duly 5:3, 105:7 duncker 1:22, 4:6, 5:1, 5:7, 5:18, 5:20, 66:13, 92:16, 96:2, 96:9, 100:19, 103:15, 104:9, 105:6, 105:14 during 14:6, 46:13, 56:5, 102:9 dutton 2:5, 3:3, 3:5, 5:6, 5:8, 5:17, 7:19, 9:20, 10:6, 11:16, 11:22, 12:23, 14:15, 14:22, 15:5, 15:24, 16:9, 17:1, 19:24, 21:7, 21:14, 21:21, 22:19, 25:10, 28:5, 30:10, 33:21, 35:6, 35:10, 37:20, 40:5, 41:9, 43:15, 46:4, 49:23, 52:4, 52:21, 53:21, 54:11, 54:23, 56:20, 57:1, 57:13, 59:2, 59:12, 60:1, 62:21, 63:5, 63:14, 64:12,
---	--	--	---

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

113

65:19, 65:22, 66:1, 66:9, 66:12, 67:7, 67:14, 67:19, 68:1, 68:5, 68:10, 68:19, 69:10, 69:14, 69:23, 70:15, 71:24, 73:17, 73:18, 76:17, 77:2, 78:24, 80:6, 83:14, 84:10, 85:21, 86:6, 92:12, 92:15, 92:22, 93:4, 94:3, 94:11, 94:17, 95:2, 95:9, 95:24, 96:1, 96:6, 96:20, 98:9, 99:12, 100:2, 100:12, 100:15, 100:18, 101:6, 101:16, 101:18, 102:8	electronic 9:9, 42:22, 43:7 element 29:6, 29:9, 29:17, 29:19, 34:1, 34:14, 35:1, 35:2, 42:12, 42:18, 46:21, 71:5, 72:24 elements 27:2, 29:3, 31:7, 35:15, 37:5, 42:5, 42:6, 45:2, 49:6, 84:20, 86:1, 86:4, 86:16 else 65:15 email 27:6, 45:5, 57:24, 62:7, 74:4, 74:8, 74:18, 77:14, 77:16, 77:22, 78:4, 78:10, 79:6, 79:12 emails 88:21 embed 10:16, 10:21, 11:1, 15:7, 15:9, 15:13, 15:20, 15:21, 16:3, 16:4, 16:23, 17:10, 30:23, 32:7, 32:15, 32:19, 32:21, 36:17, 42:10, 42:20, 43:6, 45:6, 45:8, 45:9, 45:11, 45:18, 45:19, 45:21, 45:25, 46:5, 46:9, 46:10,	46:12, 48:15, 48:16, 48:24, 49:4, 49:9, 49:11, 50:3, 50:16, 50:18, 50:21, 50:22, 51:14, 51:15, 51:22, 52:2, 52:7, 52:10, 52:11, 52:12, 52:14, 52:25, 53:1, 53:4, 53:22, 53:24, 54:6, 58:23, 61:21, 66:3, 66:18, 66:22, 67:2, 67:9, 67:15, 67:20, 68:6, 97:14, 98:14, 98:18, 98:19 embedded 9:16, 10:12, 11:18, 11:21, 36:10, 43:14, 53:18, 88:4 embedding 16:10, 16:18, 42:8, 47:1, 57:22, 58:4, 60:3, 61:10, 66:5, 66:7, 66:14, 68:13, 88:12, 97:11, 97:21 embodiment 50:6 embodiments 78:25 emphasis 22:25 employed 92:23, 93:13, 93:14, 105:21 empty 22:11 enable 9:4, 9:7, 42:9,	42:20, 43:5, 48:13, 48:15, 48:23, 58:22, 58:23 enables 9:13, 42:25, 43:11, 50:23 enabling 9:15, 43:13 end 10:11, 12:6, 12:7, 13:3, 29:1, 31:4, 41:1, 41:2, 42:3, 77:7, 83:23 end-to-end 49:17, 49:21 engine 41:20 enjoyed 74:22 enriched 21:12 entire 29:11, 41:13, 41:14, 73:5, 101:22 entirety 60:23 entitled 94:17 equally 24:23 equals 51:4 equity 93:16, 93:18, 94:12, 95:12 error 49:2, 59:13 essentially 10:13, 10:25, 12:8, 13:14, 15:2, 15:7, 15:8, 15:16, 15:17, 16:15, 17:23, 22:17,
E			
each 19:15, 51:23, 51:25, 52:1 earlier 12:25, 17:16, 30:5, 43:22, 44:25, 55:22, 71:16, 82:9, 87:7 early 50:14, 52:19, 58:1, 60:6, 60:19, 60:24 easy 48:17 effectively 58:7 either 41:25, 58:12, 69:7, 69:16, 75:7, 97:11			

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

114

<p>32:22, 32:23, 33:2, 40:1, 49:14, 51:7, 51:21, 57:8, 71:10, 72:18, 82:11, 88:4 establish 28:18 established 43:22, 100:9 et 18:20, 19:3 every 6:24, 65:13 everyone 33:23 everything 56:19, 79:3, 86:14, 90:17 evidence 27:15, 27:18, 28:6, 28:17, 39:6, 102:3 evolved 24:4, 25:2, 25:21 evolving 59:19, 60:6 exact 18:4, 48:2, 48:9, 52:19, 63:17, 104:4, 104:5 exactly 20:7, 20:10, 23:12, 23:13, 24:1, 25:25, 27:10, 49:5, 63:20, 64:23, 67:6, 67:12, 86:25, 88:1, 88:18, 92:1 examination 5:5, 96:7, 100:17 examinations 3:1 examined 4:6</p>	<p>example 10:4, 10:8, 17:17, 21:11, 36:17, 38:3, 43:16, 47:15, 50:3, 53:5, 60:8, 66:2, 71:10, 72:15, 82:23, 82:24, 85:6, 86:25 examples 45:18, 86:23 excerpt 36:5, 36:12, 36:15, 37:11, 37:21, 38:6, 39:14, 39:15, 43:16, 44:9, 44:17, 45:10, 46:25, 47:5, 47:14, 53:3, 69:2, 69:4, 70:22, 70:25, 71:4, 72:8, 73:12, 73:18 excerpts 29:9, 29:16, 29:19, 34:5, 34:8, 34:13, 35:5, 35:18, 37:5, 41:25, 45:2, 46:20, 51:16, 52:5, 52:16, 68:24, 69:7, 70:3, 70:9 exclude 24:22 excuse 7:17 executable 32:23, 53:25 execute 32:21 executed 26:14 executing 54:3, 60:11 exhibit 3:19, 7:15,</p>	<p>26:5, 38:6, 38:11, 38:12, 38:17, 38:22, 39:8, 39:11, 39:15, 43:17, 44:10, 44:14, 44:16, 44:17, 45:9, 45:10, 45:12, 45:17, 45:18, 47:14, 69:2, 70:23, 74:1, 75:12, 76:7, 77:5, 96:12, 97:5 exhibits 3:20, 27:10 existing 83:6, 83:7 expert 75:20, 89:5 explanation 26:22, 38:24, 39:2, 39:6 explicit 53:6 explicitly 34:16, 39:18, 39:25, 44:16, 44:18, 44:20, 52:15, 58:25, 91:24 expose 15:18, 16:16, 17:13 extending 36:20 extension 53:9 external 11:19, 53:19, 54:12, 55:4, 55:20 extremely 48:3</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>fabio 2:14, 5:14</p>	<p>fact 19:6, 25:9, 50:17 facts 26:17 fair 6:7, 6:11, 6:14, 6:18, 7:3, 77:3, 78:15, 79:2 fairly 67:9 far 36:11, 66:24 fast 43:3 feature 57:12, 58:24, 67:2, 85:17 february 90:22, 91:1, 93:7 feel 17:20, 17:21, 18:4 fetch 32:22, 33:3, 55:3 fetches 53:25, 54:1 fetching 55:24 few 5:23, 66:16, 85:7, 86:2, 86:4 fields 75:1 figure 11:6, 11:7, 12:24, 13:6, 14:10, 14:16, 19:8, 19:14, 20:24, 29:24, 41:22, 44:15, 44:22, 44:23, 57:14, 57:16, 58:3, 59:3, 61:9, 61:20,</p>
---	--	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

115

62:22, 63:15, 63:22, 64:4, 64:20, 65:9, 81:1, 81:3, 81:5, 81:6, 81:8, 81:11, 81:14, 81:17, 81:20, 81:23, 81:25, 82:3, 82:7, 82:9, 82:17, 84:3, 84:11, 84:23, 86:9, 87:6, 97:3, 97:4, 97:6, 97:20, 97:24, 99:8, 99:10, 99:17 figures 77:4, 78:1, 78:11, 80:18, 80:20, 98:5, 99:3, 99:23, 100:11, 100:20, 100:24, 101:8 file 53:9, 55:12, 60:22, 66:22, 67:9, 67:16, 67:21, 68:2, 68:3, 68:7, 68:13, 86:13, 96:14, 96:17, 96:19, 96:21, 97:13, 97:14, 97:16, 98:14, 98:18, 98:19, 98:20 file's 66:18 filed 23:4, 60:15, 61:1, 62:12, 62:18, 63:7, 75:5, 75:8, 75:9, 75:17, 75:19, 77:20, 78:14, 78:16, 79:19, 100:9	files 96:23, 96:24, 101:5 filing 101:10 fill 49:10 filled 46:13 final 56:7, 59:21, 79:4, 79:5 finalized 54:22, 54:25 finally 54:19 financial 95:21 financially 105:22 find 83:24 finished 37:13, 37:23, 55:25, 56:1, 62:17, 62:18, 77:25, 78:11 finishing 26:3 firm 5:9, 5:11 first 15:25, 16:24, 37:11, 38:5, 45:15, 47:15, 50:5, 61:22, 63:11, 66:4, 67:15, 67:20, 68:6, 75:8, 75:13, 77:22, 79:7, 79:18 five 34:5, 35:5, 62:4, 62:5, 100:15 flash 47:16, 47:25, 48:13, 48:23,	53:9, 53:12, 56:21, 57:2, 57:12, 65:2, 66:18, 66:22, 67:2, 67:9, 67:15, 67:20, 67:24, 68:2, 68:3, 68:6, 68:13, 88:25, 89:2, 89:5, 98:19, 98:20, 101:5 flip 79:11 flow 39:10, 39:22, 41:14, 49:17, 49:21, 71:1, 73:20 fluid 80:4 focus 32:9 focused 48:3, 65:10 focuses 82:2 focusing 26:2 follow-up 96:10 following 104:14 follows 5:4, 74:18 font 39:5 fonts 18:19, 19:2 foregoing 103:2 form 9:24, 12:13, 14:13, 14:19, 14:25, 15:14, 16:6, 16:21, 18:10, 19:16, 21:5, 22:7,	22:10, 25:5, 28:1, 33:10, 39:17, 45:23, 51:19, 52:17, 53:16, 54:8, 54:14, 56:9, 56:23, 58:18, 59:6, 59:16, 62:15, 62:24, 63:9, 64:6, 67:4, 67:11, 67:17, 67:22, 68:4, 68:8, 68:16, 70:12, 71:22, 76:16, 78:19, 83:3, 84:5, 85:10, 85:24, 92:20, 92:25, 96:20, 98:9, 101:1, 102:5, 104:7 format 4:7 formatting 18:5, 18:19, 19:2 formed 93:3, 93:6, 93:8 forth 79:12, 105:7 four 35:18, 61:7 fox 2:3, 5:10 frame 31:12 friday 1:23, 4:1 front 12:7 full 8:12, 8:13, 12:8, 56:16, 78:22 fully 28:3, 39:8, 58:10, 86:16
--	---	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

116

function 17:11, 29:10 functionality 15:17, 16:14, 85:9 further 17:10, 37:9, 50:21, 72:16, 96:3, 100:17, 102:14, 105:12, 105:14, 105:19 furthermore 37:12	30:6, 30:8, 34:20, 34:23, 35:22, 35:24, 36:6, 40:8, 40:24, 41:10, 41:20, 42:2, 42:24, 43:10, 44:1 generator 12:11, 12:20, 12:22, 13:7, 13:13, 14:4 germany 88:16, 89:8, 89:10, 89:17, 89:24, 91:21, 91:25, 92:7 give 17:17, 74:9 given 105:10 gives 57:17 glasses 7:17 go 5:23, 7:1, 19:8, 26:20, 28:22, 32:5, 32:14, 33:25, 38:5, 38:23, 39:4, 40:3, 46:24, 50:20, 50:21, 51:12, 51:14, 55:15, 57:14, 66:17, 68:20, 70:16, 74:8, 75:23, 76:7, 77:14, 77:16, 79:6, 87:14 goes 26:21, 42:15 going 40:11, 53:7, 77:7 goldstein 2:3, 5:10	good 5:7, 5:21, 9:21, 35:6, 65:17, 66:9, 88:20, 92:12, 96:9 grab 7:17, 17:9, 30:22, 32:7, 32:14, 50:17, 50:21, 51:14 graphic 38:21, 39:19 graphical 40:2, 40:10 graphically 38:8, 85:5 graphs 40:2, 60:13 ground 5:24, 91:13 grouping 59:7 guess 10:7, 49:4, 72:19, 80:10, 82:25	34:14, 34:18, 35:3, 46:21, 81:9, 81:24 hayes 74:4, 74:6, 74:13, 77:14, 77:23 head 6:10, 88:14 header 28:25, 38:23 hear 73:16, 100:4 heart 15:16 heavily 76:21, 76:23 here 5:8, 5:15, 5:24, 6:2, 7:10, 10:14, 13:18, 17:9, 19:23, 20:11, 20:15, 23:13, 23:15, 23:17, 28:3, 28:7, 28:13, 30:12, 34:5, 35:18, 36:23, 37:8, 39:5, 42:19, 44:18, 57:15, 58:25, 65:22, 71:2, 72:14, 73:6, 73:10, 80:2, 80:15, 86:25, 91:13, 91:14 here's 86:24 hereby 103:4, 105:4 hereinbefore 105:7 hereunto 105:26 highly 25:7 hired 90:3
G		H	
gallery 37:10, 37:13, 83:9, 83:10 gave 31:6, 90:14, 98:14 general 41:16 generally 27:14 generate 8:22, 9:2, 9:5, 10:21, 14:3, 15:7, 45:25, 49:9, 49:14, 50:3, 50:16, 57:5, 57:8, 72:3, 90:15 generated 32:2, 37:25, 83:1, 85:8, 89:23, 90:13, 97:20 generates 45:25 generation 8:21, 9:2, 9:3, 9:4, 9:12, 9:17, 11:10, 12:3, 12:8, 12:10, 12:25, 13:3, 13:17, 13:20, 30:1, 30:3,		half 74:9, 96:13 hand 105:26 hanging 7:14, 26:4, 73:25, 75:11 happen 16:10, 32:20 happened 63:19 happens 16:18 happy 93:25 hard 51:5 hardware 14:7, 29:20,	

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

117

hit 17:7, 33:18 home 52:12 hood 41:6, 41:8, 41:10, 41:11, 41:23 hosted 55:19 hour 4:2, 6:25 however 54:16 html 45:10, 46:16, 49:4, 50:25, 51:4, 51:17, 52:24, 53:4, 53:22, 54:6, 54:18, 54:19, 54:24, 55:13, 56:5	62:6, 62:8, 62:23, 63:23, 64:5, 64:20, 64:21, 65:1, 71:13, 71:21, 72:1, 72:9, 72:14, 72:23, 73:22, 83:24, 83:25, 85:20, 97:11 ichart's 55:21 icharts 1:10, 7:6, 7:8, 23:4, 23:5, 30:21, 32:10, 33:1, 33:8, 33:20, 33:22, 41:12, 49:15, 50:8, 50:15, 59:4, 61:21, 71:9, 73:19, 74:6, 75:9, 75:18, 77:20, 79:19, 83:17, 87:9, 87:24, 87:25, 89:21, 90:19, 90:21, 91:2, 91:15, 92:16, 92:19, 92:23, 93:1, 93:2, 93:5, 93:8, 93:9, 93:13, 93:18, 94:12, 95:12, 95:17, 101:3, 104:10 icharts's 100:23, 101:7 id 49:11 idata 29:14, 30:19, 31:3, 31:10, 31:21, 33:16, 35:24, 35:25, 41:18, 43:24, 72:17	idea 10:10, 27:13, 34:12, 40:2, 52:20, 52:22, 87:21, 87:24, 88:1, 88:13, 88:16, 89:12, 91:11 ideas 24:7, 89:23 identification 3:19 identified 29:14, 44:14, 55:13 identifies 58:16 identifying 43:23 image 97:25 images 39:21, 76:23, 76:25 immediately 17:8, 17:14, 74:19 implement 34:19, 64:9, 64:23, 88:15 implementation 10:18, 17:5, 17:12, 57:10, 63:3, 84:7, 86:9, 86:15, 86:19, 87:8, 99:19 implemented 63:12, 64:14, 64:16, 100:10, 100:20, 100:24, 101:9 implementing 60:10 implied 44:11 implies 44:12, 44:21	imply 34:16 in-person 1:21 inc 93:5, 93:8 include 19:5, 19:6, 25:20, 39:11 included 41:19, 41:20, 80:13 includes 21:12, 28:25, 33:25, 36:5, 44:6, 44:8, 59:3 including 17:25, 59:3 inclusive 103:3 incorporated 90:21, 90:24 indecipherable 8:22, 37:14, 41:5, 43:1, 49:16, 51:23, 57:4, 76:21, 79:24, 92:8, 98:21, 100:1 independent 9:9, 9:10, 11:20, 31:17, 33:5, 42:21, 42:23, 43:7, 43:8, 54:25, 56:6, 56:8, 56:22, 56:24 index 3:1 india 90:7, 90:16 india-based 90:3 indicated 78:10 indicates 75:4 infer 39:7, 39:9
--	---	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

118

inference 63:2, 72:12	30:18, 31:5, 31:8, 32:17, 36:10, 36:12, 42:10, 42:21, 42:23, 43:6, 43:8, 43:13, 45:19, 47:1, 47:8, 47:24, 48:12, 48:14, 48:15, 48:23, 48:24, 51:24, 52:1, 55:1, 55:4, 55:8, 55:9, 58:4, 58:16, 58:23, 60:3, 61:10, 69:20, 88:3	interpreting 40:16, 60:2	41:2, 41:19, 43:23, 70:5, 71:17, 72:17
inferred 52:8, 52:13, 52:15, 71:11		inventing 27:3	<hr/> J <hr/>
inferring 40:9		invention 8:7, 8:17, 9:23, 10:3, 10:8, 10:14, 14:10, 14:16, 19:25, 20:3, 23:23, 25:23, 50:14, 66:21, 67:2, 74:23, 90:3	january 34:10
information 56:3, 80:7, 94:20, 95:1		inventor 8:4	jennifer 74:4, 74:6, 74:13, 74:19, 77:14, 77:23, 77:25, 78:4, 79:7, 79:13, 79:24, 80:2
informed 24:11		involved 73:5	job 5:24, 5:25, 9:21
infringement 7:8	interactivity 9:16, 43:14, 88:7	involves 7:5	jogging 88:17
inherent 57:11	interest 95:21	ipr 1:8, 7:10, 7:15, 26:8, 102:3	journal 17:21
initial 27:8, 27:11	interested 105:22	istudio 52:6, 57:3	july 74:15, 74:20, 75:5, 75:19, 79:15, 91:23, 100:9
initially 93:5, 99:13	interface 9:3, 9:4, 9:12, 9:18, 11:10, 12:11, 12:21, 13:4, 23:6, 30:9, 30:11, 31:16, 36:1, 36:2, 36:7, 42:24, 43:10, 53:5, 69:16, 69:19, 83:17, 84:2, 84:23	italicized 39:1, 39:5	jump 77:13
input 9:14, 9:15, 43:1, 43:11, 43:12, 79:23, 79:25, 80:1		item 76:1	june 74:12
insert 66:25		itself 12:18, 16:19, 18:8, 36:12, 37:1, 46:5, 46:17, 56:11, 57:12, 60:9, 61:15, 69:21, 97:20, 99:4	<hr/> K <hr/>
inside 33:14, 40:10, 40:15, 54:4, 85:18	intermediate 97:10	iwiz 30:5, 30:7, 30:8, 30:12, 30:14, 30:20, 31:4, 31:10, 31:21, 33:16, 35:21, 36:2, 36:20, 36:25, 40:1, 40:2, 40:10, 40:15,	kessler 2:3, 5:9
instructed 6:22	internet 10:13, 10:16, 11:4, 16:17		key 21:19
instructing 94:5	interpret 25:8, 39:20, 64:19, 65:7		kind 5:23, 10:3, 19:13, 19:18, 27:4, 31:13, 36:20, 39:1, 46:25, 47:13, 49:16, 49:18, 49:20, 50:7, 50:14, 50:16, 52:22, 55:11, 55:19, 57:15, 65:22, 66:15,
inter 101:23	interpretation 22:16		
interact 12:21, 13:15			
interactive 8:23, 9:3, 9:5, 9:8, 9:11, 9:15, 10:11, 10:16, 10:23, 11:4, 15:2, 15:13, 15:18, 16:1, 16:4, 16:20, 17:7, 17:18,			

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

119

71:11, 79:11, 80:4, 80:22, 86:2, 87:20, 88:6, 88:8 knowledgeable 66:22	40:11, 75:13 legal 8:16, 75:20, 90:11 less 76:18 lester 2:13, 2:17, 5:15 let's 28:10, 28:22, 37:11, 38:5, 42:5, 46:24, 47:13, 49:1, 57:14, 60:8, 68:20, 70:16, 81:1 likewise 72:17 limitation 70:17, 70:22 limitations 68:21, 68:25 limited 93:23 line 13:7, 13:9, 18:13, 18:20, 19:3, 20:15, 20:20, 22:2, 23:1, 29:25, 45:15, 65:21, 104:15 lined 30:5 lines 13:6, 13:12, 13:13 link 32:16, 32:18, 49:10, 57:23, 62:6 listed 8:4, 23:17, 51:11, 61:24 litigation 7:12 little 30:13, 51:5,	76:14, 77:10, 77:19 live 56:13, 86:23 lives 54:4 llc 1:4, 1:10, 5:9, 93:10, 93:13, 93:19, 94:13, 95:13, 95:18 loading 56:5 local 32:24, 54:20, 56:2, 56:14 locally 32:11 located 70:19, 72:10, 73:2, 82:15 location 51:21 long 80:17, 97:6 longer 55:3 look 17:17, 17:20, 17:21, 18:4, 23:11, 27:9, 27:10, 34:17, 38:19, 38:22, 46:10, 49:1, 51:20, 60:22, 64:1, 69:4, 69:24, 71:1, 74:18, 79:21, 82:7, 83:22, 84:8, 88:21, 96:12, 97:1, 97:3, 97:25 looked 82:9, 83:20 looking 12:17, 63:22, 64:3, 87:1, 87:3 looks 46:12, 46:14,	71:6, 74:14, 75:10, 81:19, 81:22, 82:6 lot 59:21, 76:20
L			M
label 49:2 labeled 11:24, 12:1, 12:4, 12:11, 19:9, 36:14, 57:25 language 78:23 laptop 54:20, 55:7, 55:8 last 26:11, 37:21, 95:20 later 41:3, 61:5, 61:7, 61:11, 80:16 launch 86:13, 92:1, 92:6, 92:8, 92:10 launched 61:5, 61:12 law 5:9, 5:11 layperson 90:10 lead 84:15, 84:17 learning 74:23 least 98:5 led 10:13, 79:8, 79:20 left 35:12, 40:3,			made 10:25, 33:17, 63:12, 90:22 majority 95:8 make 6:10, 12:16, 17:13, 28:16, 31:20, 49:25, 55:15, 63:2, 64:2, 64:10, 64:13, 71:2, 72:2, 80:22, 83:7, 83:13, 104:14 makes 21:13, 23:15, 58:25 making 30:21, 33:13, 50:5, 65:12, 73:5, 88:11 manifestation 60:14 manifested 58:13, 59:20 many 23:12, 60:18 march 89:20 marino 2:14, 3:4, 5:13, 5:14, 7:16, 9:24, 12:13, 14:13, 14:19, 14:25, 15:14, 16:6, 16:21, 19:16, 21:5, 21:10, 21:18, 22:7, 25:5, 28:1,

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

120

<p>33:10, 39:17, 45:23, 51:19, 52:17, 53:16, 54:8, 54:14, 56:9, 56:23, 58:18, 59:6, 59:16, 62:15, 62:24, 63:9, 64:6, 65:17, 65:20, 65:24, 67:4, 67:11, 67:17, 67:22, 68:4, 68:8, 68:16, 70:12, 71:22, 76:16, 78:19, 83:3, 84:5, 85:10, 85:24, 92:20, 92:25, 93:20, 94:5, 94:18, 95:4, 95:7, 95:22, 96:5, 96:8, 96:22, 98:11, 99:1, 99:14, 100:7, 100:14, 101:1, 102:5, 102:17 marked 3:19, 3:20, 7:15, 26:5, 74:1, 75:11 marquee 37:14, 37:18 marriage 105:20 material 27:24 materializes 53:23, 54:10 matter 105:23 mattered 26:2 maybe 71:6 mean 15:6, 18:14, 34:10, 53:14,</p>	<p>64:1, 69:12, 80:15, 91:5, 91:8, 92:6, 93:15, 98:17, 99:18, 101:3, 101:21 meaning 48:9 means 10:15, 47:12, 53:17 meant 20:7, 59:22, 86:3 mechanism 16:13, 48:17 meet 89:10 meeting 74:13, 74:15, 75:8 mention 44:16, 44:18, 44:20 mentioned 19:4, 19:17, 44:15, 58:25, 59:9, 99:16 met 50:14 metadata 33:2, 33:3, 54:1 methods 15:22, 16:17 microsecond 56:15 middle 65:21 midnight 74:20 might 28:13 minimal 28:12, 28:16 minute 17:5, 17:7, 56:19</p>	<p>minutes 100:15 mischaracterizes 99:12 mm-hmm 13:8, 18:16, 19:10, 20:22, 28:24, 30:2, 35:14, 42:16, 74:2, 76:10, 77:15, 91:20, 98:8 mode 27:2 model 34:2, 58:22 module 8:20, 8:21, 8:22, 9:2, 9:6, 9:7, 9:13, 9:19, 11:9, 11:10, 11:12, 11:15, 11:17, 11:23, 12:1, 12:3, 12:10, 12:25, 13:3, 13:15, 13:16, 13:17, 13:18, 13:20, 13:21, 14:11, 14:17, 14:24, 15:1, 15:4, 15:10, 15:12, 15:25, 29:1, 29:12, 29:13, 29:17, 29:20, 29:25, 30:1, 30:4, 30:6, 30:8, 34:6, 34:9, 34:14, 34:21, 34:24, 35:2, 35:4, 35:22, 35:24, 35:25, 36:6, 37:6, 38:7, 39:12, 39:16, 40:6, 40:7, 40:8, 40:17, 40:20, 40:23,</p>	<p>40:24, 41:10, 42:2, 42:6, 42:9, 42:11, 42:17, 42:20, 42:25, 43:5, 43:10, 44:1, 44:2, 44:4, 44:7, 44:8, 44:9, 44:13, 44:18, 45:3, 46:6, 46:18, 46:22, 70:19, 71:17, 72:10, 73:2, 73:22, 81:25, 82:2, 82:3 modules 82:2 moment 32:20, 33:19, 53:24, 54:1, 54:10, 54:21, 55:24, 74:9, 88:9 montgomery 89:4, 89:7, 89:14, 89:20, 89:24 month 77:19 more 15:15, 27:14, 32:7, 66:16, 78:15, 78:25, 82:2, 95:10, 95:11 morning 5:7, 5:21 most 18:10, 22:10, 86:11, 86:16 mostly 60:25 move 42:5 moved 90:20 much 8:9, 60:25,</p>
--	--	--	---

Transcript of Seymour Duncker
Conducted on October 10, 2025

62:17, 89:25 multiple 73:4, 73:9 multitude 18:3 munich 90:12, 90:18 myself 90:12	95:16 nitpicking 91:5 nods 6:10 non 101:15 none 29:16, 29:19, 34:8, 34:13 nonprovisional 8:13, 80:8, 80:13, 81:4, 81:6, 81:7, 81:18, 81:21, 82:4, 82:18, 86:10, 99:3, 99:8, 99:9, 99:11 note 104:3 nothing 5:4, 53:3, 56:10 number 8:14, 27:6, 49:7, 57:17, 63:2, 75:12, 75:13, 99:2 numbered 75:1, 75:2 nw 2:6	58:16, 60:3, 61:10, 65:2, 67:3, 67:24, 72:5, 98:22, 98:23, 98:25 objecting 94:6 objection 9:24, 12:13, 14:13, 14:19, 14:25, 15:14, 16:6, 16:21, 19:16, 21:5, 21:10, 21:18, 22:7, 25:5, 28:1, 33:10, 39:17, 45:23, 51:19, 52:17, 53:16, 54:8, 54:14, 56:9, 56:23, 58:18, 59:6, 59:16, 62:15, 62:24, 63:9, 64:6, 67:4, 67:11, 67:17, 67:22, 68:4, 68:8, 68:16, 70:12, 71:22, 76:16, 78:19, 83:3, 84:5, 85:10, 85:24, 92:20, 92:25, 93:20, 96:20, 98:9, 99:12, 100:2, 100:12, 101:1, 102:5 objective 15:4 objects 40:11, 40:14 obtain 9:13, 43:1, 43:11 obviously 47:21, 59:19, 94:25 occurred 105:15	occurs 66:7 october 1:23, 4:2, 104:11, 105:16, 105:27 offer 24:4 office 1:1 offices 105:15 oh 8:10, 8:15, 18:14, 45:16, 101:3 old 28:15 once 11:3, 30:17, 32:18, 32:19, 51:11, 54:1, 54:19, 54:21, 55:7, 55:16, 55:25, 66:17 one 6:5, 7:11, 13:7, 15:19, 18:5, 20:24, 21:1, 27:6, 29:3, 31:15, 31:16, 40:16, 49:7, 51:21, 58:3, 59:4, 61:19, 62:6, 64:19, 64:20, 64:25, 65:16, 65:22, 67:15, 67:20, 68:6, 69:2, 69:4, 70:22, 73:6, 73:16, 75:1, 76:6, 76:14, 77:10, 83:16, 84:6, 84:7, 87:6, 88:8, 97:7, 99:7, 99:19
N	O		
name 5:8, 5:18, 5:20 nature 53:23, 54:9, 54:15, 56:12, 56:18 nd 105:26 necessarily 83:4 need 6:25, 7:17, 22:17, 38:18, 38:19, 50:19, 50:20, 54:18, 93:22 needed 79:17, 79:24, 80:1, 80:10, 86:14 needs 46:10, 51:7, 55:3 new 17:19, 17:20, 55:24, 74:23, 80:18, 80:20, 81:3, 81:5, 81:12, 83:23, 83:25, 84:1 next 45:10, 50:22, 55:16, 68:24, 69:4, 75:7 nine 19:13, 20:24 nisha 2:21, 5:15,	oakmead 2:15, 4:3 oath 5:4 object 6:20, 33:2, 36:9, 40:3, 47:16, 47:25, 48:13, 48:23, 49:8, 49:11, 53:9, 53:12, 56:21, 57:2, 57:11, 58:4,		

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

122

<p>one) _____ 103:8 ones 19:19, 92:4 ongoing 80:4 online 11:17, 16:14, 16:16, 44:11, 47:10, 47:11, 48:4, 87:17 only 7:1, 17:25, 22:12, 71:4 open 32:21, 33:6, 56:15, 57:2, 83:25 opened 9:11, 42:23, 43:9 opening 32:24 opens 53:24, 54:10 operated 72:18 operation 99:24 opinion 12:9, 21:3, 21:8, 21:11, 21:15, 22:4, 29:13, 53:15, 86:7 option 52:6, 52:14, 58:3, 58:15, 58:17, 59:14, 61:11, 61:17, 61:22, 63:24, 64:5, 64:20 options 20:24, 57:18, 57:20, 57:22, 57:25, 59:4, 61:19, 61:24, 62:2, 62:8,</p>	<p>62:13 order 50:25, 51:7, 94:19, 94:21, 94:23, 94:24, 95:3, 95:5 original 10:10, 17:4, 19:19, 22:8, 38:15, 93:2 other 15:3, 23:13, 48:5, 61:24, 62:2, 72:13, 77:9, 84:7, 95:15, 99:19 otherwise 25:14, 95:23, 105:23 out 30:5, 65:22, 89:4, 89:7 outcome 105:23 outline 45:5 outlined 42:19 outlines 40:1 output 45:24, 46:16 outside 15:18, 31:15 over 6:5, 73:16, 76:14, 77:10, 77:19 overall 73:3 own 8:7, 9:22, 10:3, 11:19, 14:3, 17:6, 17:8, 17:14, 40:25, 41:5, 51:15, 83:21, 94:12, 95:17</p>	<p>owner 1:12, 2:11, 93:16 owner's 27:21 owns 95:15</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>p-a-n-e 69:10 packaging 31:14 page 3:2, 3:19, 11:4, 26:11, 26:20, 28:23, 30:3, 30:14, 32:25, 33:6, 33:25, 34:17, 34:20, 34:23, 35:13, 36:4, 36:5, 36:11, 37:7, 37:9, 38:6, 38:23, 39:4, 39:10, 39:14, 40:22, 41:14, 41:22, 42:15, 42:19, 43:16, 44:14, 45:4, 45:14, 45:15, 45:19, 46:24, 49:14, 52:8, 53:24, 54:2, 54:3, 54:4, 54:6, 54:10, 54:15, 54:16, 54:19, 54:24, 55:6, 55:7, 55:17, 55:23, 55:24, 55:25, 56:1, 56:6, 56:7, 56:12, 56:13, 56:16, 56:17, 60:5, 61:14, 66:2, 66:17, 68:20, 69:5,</p>	<p>70:16, 74:8, 74:9, 74:19, 74:25, 75:13, 75:23, 76:7, 76:11, 76:14, 77:5, 77:7, 77:10, 77:16, 79:6, 82:24, 83:1, 83:15, 84:17, 84:24, 85:6, 86:22, 86:25, 87:9, 91:20, 96:11, 96:13, 97:2, 97:24, 99:9, 99:16, 104:15 page-by-page 80:23 pages 27:16, 27:18, 28:20, 41:25, 52:12, 68:24, 77:10, 103:2 pane 61:25, 69:7, 69:9, 69:13, 69:15, 69:16, 69:22, 69:25, 70:4, 70:6, 70:10, 70:11, 70:18, 82:13, 82:15, 84:16, 84:20, 84:22, 84:25, 87:4 panes 85:2 pappas 2:4, 5:10 paradigm 73:7, 88:13 paragraph 87:15, 88:25, 89:19, 91:18 parameter 9:15, 43:13 parameterized 46:13 parkway 2:15, 4:3</p>
---	---	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

123

<p>part 24:23, 24:25, 40:24, 41:2, 45:4, 46:2, 46:5, 46:7, 47:17, 48:10, 48:11, 49:5, 49:6, 50:2, 50:5, 50:7, 50:13, 59:14, 70:6, 88:6, 101:22</p> <p>partes 101:23</p> <p>particular 24:3, 24:5, 24:8, 26:1, 51:12, 63:21</p> <p>parties 105:12, 105:20, 105:21</p> <p>partner 5:15, 93:14, 93:15</p> <p>parts 49:12, 60:20, 91:12, 91:15</p> <p>pass 96:4</p> <p>paste 11:2, 32:19, 53:4</p> <p>patent 1:1, 1:2, 1:9, 1:12, 2:11, 7:8, 7:23, 7:24, 8:1, 8:4, 8:8, 8:12, 8:13, 9:23, 11:6, 12:16, 12:18, 12:19, 14:23, 20:12, 22:23, 23:5, 24:18, 27:21, 29:4, 29:25, 44:23, 57:14, 58:16, 60:16, 60:22, 61:1, 62:12, 63:8,</p>	<p>74:6, 75:1, 75:8, 75:24, 76:19, 78:20, 79:8, 79:20, 80:7, 80:9, 80:14, 80:18, 81:3, 81:11, 82:17, 89:21, 97:3, 97:4, 99:4</p> <p>patents 7:11</p> <p>path 49:3, 52:9, 55:12, 65:6, 65:15</p> <p>pathways 59:11</p> <p>pdf 36:17, 48:19, 58:5, 60:3, 61:11, 66:19, 66:23, 67:16, 68:13, 98:15, 98:19</p> <p>pdfs 11:20</p> <p>pending 7:2, 7:3</p> <p>people 17:9, 50:19, 50:21</p> <p>percent 72:19, 91:12, 93:18, 95:10, 95:11, 95:15, 95:17, 98:4, 100:1, 100:5</p> <p>percentage 94:10, 94:12, 95:12</p> <p>performed 91:2, 91:21</p> <p>perhaps 65:18</p> <p>personal 2:1, 21:11, 83:21</p> <p>personally 2:20, 4:4, 4:5,</p>	<p>19:4, 105:15</p> <p>perspective 19:5, 24:4, 24:12, 25:2, 25:21, 41:2, 46:10</p> <p>petitioner 1:6, 2:2, 5:2</p> <p>phase 27:1</p> <p>phone 91:8</p> <p>phrases 48:9</p> <p>physically 92:2</p> <p>pick 66:15</p> <p>picture 22:22</p> <p>pictures 51:9, 76:20, 76:22</p> <p>pie 18:1</p> <p>piece 15:19, 88:11, 90:16</p> <p>pivot 84:19</p> <p>place 50:20, 51:15, 83:16, 90:23, 94:19</p> <p>placed 53:18</p> <p>placing 87:17</p> <p>plan 6:24</p> <p>play 73:11</p> <p>please 21:6, 103:1</p> <p>plus 76:25</p> <p>point 28:16, 45:12,</p>	<p>56:4, 60:9, 65:17, 90:1, 90:19, 93:9, 93:24</p> <p>pointed 44:22</p> <p>pointing 42:18, 52:23, 72:23</p> <p>portal 11:18, 11:19, 17:6, 17:8, 17:14, 30:16, 30:17, 30:21, 30:22, 30:24, 31:24, 32:1, 32:6, 32:8, 32:15, 33:8, 33:20, 33:22, 36:24, 36:25, 38:2, 49:15, 50:8, 50:15, 50:18, 51:9, 51:11, 71:9, 71:10, 71:13, 71:21, 72:1, 72:6, 72:9, 72:14, 72:23, 73:23, 83:17, 83:22</p> <p>portal's 37:2</p> <p>portals 52:12</p> <p>potentially 64:8</p> <p>powerful 21:13</p> <p>powerpoint 36:17, 58:5, 60:3, 61:11, 66:19, 67:2, 67:3, 67:10, 67:21, 68:7, 68:14, 89:14, 98:15</p> <p>ppts 11:20</p>
---	---	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

124

<p>practice 90:3, 90:7, 90:9 pre 54:17 precise 20:14 precisely 24:5, 32:7, 64:9, 92:11 precursor 36:23 predefined 37:14, 37:16, 37:18 prepared 4:7, 26:17 preparing 91:25, 92:7, 92:9 present 2:20, 31:14, 51:17 presentation 68:7, 89:15 presently 94:24 preset 18:18, 20:4, 20:15, 20:17, 20:18, 20:21, 20:23, 20:25, 22:21, 22:23, 23:2, 23:5, 23:9, 24:2, 24:19, 24:20, 24:21, 25:1, 82:10, 84:11, 87:13 presets 19:9, 19:11, 19:20, 19:23, 20:6, 20:7, 20:8, 20:12, 21:1, 21:12, 21:13, 21:19, 21:22, 22:11, 22:18, 22:22,</p>	<p>22:23, 22:25, 23:7, 23:9, 23:16, 24:10, 24:11, 24:15, 24:16, 25:13, 25:20, 82:11, 85:2, 87:1, 87:10 presetable 22:10 pretty 8:9, 31:19, 48:1, 48:6, 60:25, 62:17, 66:24, 68:17, 89:25 previously 7:14, 26:5, 44:23, 74:1, 75:11 print 104:3, 104:5 prior 92:16 private 16:16, 33:17, 91:18 probably 48:8, 58:10, 60:17, 65:11, 84:19, 91:13 problem 94:19 proceeding 26:9, 101:20, 101:21 process 14:6, 16:24, 40:4, 46:25, 47:10, 48:4, 48:5, 49:5, 50:23, 52:13, 54:25, 55:22, 56:5, 60:19, 67:9, 68:14, 68:18, 78:21, 80:5 processing 54:21</p>	<p>produce 16:19 produced 11:1, 46:7 product 10:22, 26:3, 30:19, 30:20, 31:4, 31:14, 31:18, 41:1, 48:4, 58:13, 59:10, 59:20, 60:10, 60:11, 60:14, 60:15, 60:17, 60:20, 60:23, 61:5, 61:12, 61:15, 62:17, 63:11, 63:18, 65:11, 76:24, 79:21, 86:21, 86:23, 91:9, 97:20 products 99:24 professional 37:15, 37:19 program 9:11, 42:23, 43:9, 57:3 progress 60:25 protective 94:19, 94:21, 94:23, 94:24, 95:3, 95:5 prototype 91:19, 92:5 prove 28:14 provide 27:18, 46:1 provided 38:20, 72:17, 77:1, 79:5, 79:7, 79:22, 79:24, 80:2, 80:7, 80:12, 89:14 providers 37:19</p>	<p>provides 27:15, 57:20 provision 15:21 provisional 8:11, 75:4, 75:9, 75:16, 75:18, 75:21, 76:5, 76:6, 76:8, 76:12, 77:4, 77:20, 78:14, 78:16, 78:22, 79:1, 80:21, 81:12, 81:14, 81:17, 82:5, 82:18, 82:23, 82:24, 83:15, 84:4, 84:11, 84:24, 85:4, 86:8, 86:20, 86:22, 86:24, 99:4, 99:23, 100:9, 100:11, 100:20, 100:24, 101:8, 101:10, 101:14, 101:16 public 17:3, 17:6, 30:17, 32:5, 32:14, 33:7, 33:13 publications 17:18 publicly 11:1, 17:13, 49:8, 49:15, 49:25, 50:5, 50:7, 50:13 publish 9:8, 10:15, 10:24, 16:1, 17:5, 17:7, 17:11, 30:20, 31:8, 32:4, 33:13, 33:18, 42:10, 42:20, 43:6, 44:6,</p>
--	--	--	---

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

125

44:11, 47:4, 47:7, 47:12, 47:15, 47:19, 47:22, 47:24, 48:4, 48:8, 48:11, 48:13, 48:21, 49:2, 49:3, 49:5, 49:6, 52:9, 52:10, 52:23, 52:24, 57:25, 58:2, 58:3, 58:12, 58:16, 58:23, 59:4, 59:8, 59:22, 61:11, 61:15, 61:16, 61:17, 61:25, 63:1, 63:24, 65:5, 65:14, 85:20, 97:17, 98:1 published 9:16, 10:12, 17:2, 30:18, 32:3, 43:14, 58:11, 59:14, 65:14, 88:4 publisher 36:8 publishing 10:25, 15:16, 15:19, 16:10, 16:12, 16:13, 16:18, 16:19, 16:24, 42:8, 46:13, 47:1, 47:9, 47:15, 49:17, 49:21, 49:25, 50:6, 50:8, 50:15, 50:23, 50:24, 50:25, 57:20, 60:4, 60:11, 61:20, 62:3, 62:9, 62:10, 62:13, 62:18, 62:23, 63:7, 63:16, 64:5,	64:14, 64:21, 65:3, 65:8, 66:4, 66:7, 66:15, 88:12, 97:7, 97:11, 98:6 put 15:8, 15:13, 33:4, 33:8, 48:19, 48:20, 53:1 <hr/> Q question 6:6, 6:14, 6:17, 6:18, 6:21, 7:2, 7:3, 21:6, 32:13, 50:10, 67:24, 88:20, 94:7, 94:8, 94:9, 94:18, 99:8, 100:22, 101:4 questions 5:24, 6:3, 6:9, 6:13, 65:21, 66:16, 95:21, 96:3, 96:10, 96:13, 99:2, 102:14 quick 35:7, 74:9 quite 25:24, 76:18, 86:15 quote 28:25, 29:1, 34:1 <hr/> R racing 79:22 re-embed 30:23, 32:8 reach 89:7 reached 89:4	read 8:17, 24:20, 58:6, 58:21, 103:1 reading 9:22, 40:6, 83:4 ready 86:14 real 33:3, 56:15 realized 88:9 really 36:20, 43:3, 64:2, 99:16 reasonable 63:23, 65:7 recall 20:10, 23:13, 23:19, 23:21, 24:3, 24:5, 24:8, 24:9, 24:15, 29:24, 30:1, 38:21, 63:21, 80:12, 91:14, 92:1, 92:4, 92:11, 96:14, 96:17, 97:8, 98:15, 99:5, 100:21, 100:25, 101:12 receive 9:18, 13:17, 13:20, 14:24 received 42:1, 79:18 receiving 43:19, 70:17 recess 35:9, 66:11, 92:14, 100:16 recheck 12:15 recognize 7:20, 26:6, 74:3 recollect 80:16	recollection 79:17 record 5:12, 5:19, 6:6, 7:1, 18:17, 81:16, 105:9 recross 96:5, 96:6 red 36:4 redirect 96:4, 102:17 reduce 90:2 reduced 90:2 reduction 90:6, 90:9 refer 8:1, 12:19, 28:22, 36:24, 41:18, 42:8, 85:9, 85:17, 91:18 reference 33:1, 37:7, 37:9, 38:8, 39:18, 46:8, 74:25 referenced 72:6 referred 11:23, 12:3, 12:25, 23:16, 23:21, 24:9, 24:15, 24:18, 33:5, 61:9, 65:2, 85:13 referring 8:2, 12:4, 30:14, 33:16, 98:3 refers 20:12, 20:20, 22:23 refresh 55:17, 55:20 refreshed 11:3
---	--	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

126

refreshing 55:23 regards 23:20, 101:4 regulations 4:8 relate 29:10, 29:11, 42:6 related 105:19 release 63:11 released 59:10, 60:9, 60:15 releasing 79:22 relevant 28:2, 28:7 relied 76:21, 76:23 rely 27:15, 27:19, 28:17, 102:2 relying 46:25, 71:13 remember 66:24, 67:6, 67:13 remembered 4:1 remote 70:20, 71:10, 71:14, 72:9, 72:10, 72:25, 73:1, 73:8 render 9:13, 11:3, 32:23, 42:25, 43:11, 53:18, 53:19, 55:7 rendered 33:6 rendering 54:3, 54:17, 54:18, 56:2, 56:7	repeat 21:6, 67:23, 100:22 report 41:15, 42:1, 60:5, 66:2, 66:17 reporter 1:31, 4:5, 6:2, 8:24, 11:11, 11:14, 30:7, 37:16, 41:7, 43:2, 49:18, 49:22, 51:25, 57:6, 69:8, 69:11, 69:18, 73:15, 76:22, 79:25, 85:16, 92:9, 98:24, 100:3, 100:6, 101:14, 101:17, 105:1, 105:3, 105:31 reporter's 3:11 repository 13:23, 13:24, 14:8 represent 13:12, 84:8 represented 45:10, 105:12 represents 24:12 require 53:19, 54:12 required 28:12, 33:2, 78:15, 81:10, 81:24 requirement 49:24 requires 25:13, 34:18, 69:25 reread 10:1 rerender 9:14, 43:12	responded 74:20 responds 77:25, 78:5 rest 95:22 restudy 20:17 resulting 72:5 retain 9:16, 43:14 retrieve 14:5, 51:1, 51:3, 55:21 reveal 52:2 review 74:10, 101:23 road 87:17 role 92:19, 92:21, 93:12 route 48:20, 48:21, 59:23, 61:16, 89:1 routes 58:8 rpr 1:31 rules 5:24 run 53:17, 81:10, 81:24 <hr/> S <hr/> s-h-a-r-e-r 11:16 said 4:2, 4:6, 4:7, 13:1, 20:8, 23:24, 25:24, 30:7, 32:14, 60:6, 63:3, 67:24, 69:8,	71:16, 74:22, 85:16, 96:11, 98:13, 99:13, 101:14 same 5:11, 14:20, 18:4, 21:10, 21:18, 24:20, 30:24, 39:4, 39:14, 55:12, 74:19, 75:7, 81:20, 83:13, 84:8, 99:10 save 55:16, 83:7, 83:12 saving 55:11 say 19:21, 22:17, 23:25, 24:18, 39:25, 50:1, 52:22, 53:11, 58:21, 60:24, 64:1, 65:15, 71:23, 71:25, 75:21, 89:20, 91:24, 93:15, 95:23, 96:25, 98:1, 100:22 saying 11:11, 15:12, 23:9, 24:25, 28:13, 35:21, 36:5, 48:7, 50:13, 50:24, 59:13, 61:9, 62:2, 72:22, 85:23 says 19:23, 20:8, 20:19, 23:1, 40:19, 44:11, 52:23, 53:1, 53:3, 58:1, 62:16, 62:22, 63:1, 65:4, 65:14, 71:9,
--	---	---	---

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

127

<p>72:15, 83:16, 85:19 scope 93:20, 94:6, 100:12 screenshots 76:24, 77:1, 86:21, 99:24 second 15:19, 16:3, 50:2, 51:23 section 4:8, 27:4, 27:14, 28:22, 34:1, 35:15, 68:21, 87:16 see 8:14, 13:7, 13:22, 13:24, 18:21, 23:14, 26:23, 34:3, 39:8, 39:21, 40:2, 43:17, 45:13, 68:22, 70:20, 75:2, 75:14, 77:17, 78:3, 78:7, 79:13, 80:2, 81:14, 83:23, 84:12, 87:18, 91:5, 91:19, 98:1 seeing 63:19 select 20:23, 20:24, 22:18, 22:20, 25:14, 25:15, 37:13, 41:4, 72:4, 82:12, 87:12, 87:13 selecting 20:20, 21:3, 21:4, 21:8, 21:9, 21:15, 21:16, 22:4, 22:5, 22:6, 22:20, 23:2,</p>	<p>37:23 selection 59:8, 70:17 self-contained 9:8, 9:10, 42:21, 42:22, 43:7, 43:8, 47:16, 53:11, 53:12, 53:14, 53:17, 53:22, 53:23, 54:7, 54:9, 54:22, 56:1, 56:6, 56:8, 56:18, 56:21, 56:25, 57:11, 96:17 sending 57:23, 62:6 sends 55:6 sense 12:18, 17:7, 22:14, 23:15, 59:1, 63:13, 64:2, 71:2, 72:2 sensitive 94:25 sent 74:4 sentence 18:17, 24:20 separate 20:1, 31:23, 51:6, 58:24, 59:1, 59:11, 59:24, 60:12, 60:14, 62:19, 62:20, 64:17, 88:5, 88:10, 97:12, 98:6 separated 23:5, 23:7, 62:19, 63:4 separating 88:10 september 61:2, 61:6 served 54:16</p>	<p>server 32:11, 53:19, 54:12, 54:16, 55:4, 55:6, 55:20, 55:21, 70:20, 70:25, 71:2, 71:3, 71:10, 71:14, 72:9, 72:11, 72:13, 72:17, 72:19, 72:24, 72:25, 73:1, 73:6, 73:7, 73:9, 73:11, 73:19, 73:22 servers 73:4, 73:8 service 27:9, 34:18, 37:19 services 37:15 set 18:20, 19:3, 22:11, 27:8, 28:12, 28:16, 105:7, 105:26 settings 18:5, 18:19, 19:2 several 91:6 seymour 1:22, 4:5, 5:1, 5:20, 103:15, 104:9, 105:6, 105:14 share 15:23, 47:11, 48:18, 95:8, 98:1 shared 11:10, 11:11, 15:3 sharer 11:13, 11:14, 11:15, 11:16, 14:11, 14:17,</p>	<p>15:1, 15:4 sharing 9:7, 14:23, 15:10, 15:12, 15:25, 42:6, 42:9, 42:11, 42:17, 42:19, 43:5, 44:4, 44:7, 44:8, 44:9, 44:12, 44:13, 44:18, 45:3, 46:6, 46:18, 46:21, 58:22, 98:7 shift 88:13 shock 53:9 shockwave 47:25, 48:13, 48:23, 56:21, 65:2 short 92:13 shortened 85:25, 86:3 shorthand 4:4, 105:1, 105:3, 105:31 should 47:18, 48:7, 59:14 show 14:11, 14:16, 27:22, 29:11, 29:17, 29:19, 30:3, 34:5, 34:8, 34:14, 34:16, 37:6, 38:6, 39:10, 39:15, 40:11, 41:23, 42:1, 45:3, 45:4, 45:5, 45:8, 46:21, 47:1, 47:15, 51:16, 52:6, 52:18, 66:4, 69:7,</p>
---	---	---	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

128

<p>70:3, 70:7, 70:10, 70:13, 70:14, 70:25, 71:2, 71:3, 71:20, 71:25, 72:8, 72:10, 72:13, 73:12, 73:18, 82:13 showed 82:10 showing 27:4, 46:17, 47:7, 52:11, 81:9, 99:10 shown 11:7, 13:18, 14:10, 14:16, 30:11, 36:11, 37:2, 41:14, 44:9, 47:5, 52:10, 57:15, 71:17, 75:12, 81:8, 83:1, 84:2, 84:3, 86:9, 86:19, 87:8, 100:10, 100:20, 100:24 shows 11:9, 13:6, 13:7, 13:9, 19:9, 22:22, 35:3, 43:19, 46:25, 47:17, 52:24, 53:8, 59:7, 59:9, 70:5, 81:23, 82:1, 82:11, 82:14 side 19:14, 48:18 sign 104:7 signature 26:12 signature-plkal 105:29 significant 65:12</p>	<p>similar 46:11, 83:20, 83:22, 84:24 simple 85:7, 86:2, 86:5 simply 11:2, 22:10, 50:18 since 86:15 single 73:6, 73:11 site 34:13, 50:22 sitting 91:14 six 61:24, 62:2 sixth 62:6 size 18:19, 19:2 slipped 98:12 slower 8:25 snippet 45:5 software 1:4, 5:9, 45:22 some 25:24, 79:12, 80:18, 86:16, 90:19, 93:9, 96:10, 96:13 somehow 13:14 someone 32:5, 50:25, 55:10, 63:22, 66:21 something 16:15, 31:11, 46:11 sometime 60:24 somewhere 46:8, 88:21,</p>	<p>88:22 sooner 6:25 sorry 8:10, 8:15, 8:24, 8:25, 9:1, 27:7, 30:7, 37:12, 37:16, 43:2, 43:4, 49:18, 49:20, 50:9, 57:6, 67:23, 69:8, 73:15, 77:13, 78:3, 79:25, 81:16, 94:9, 94:14, 100:3, 100:22, 101:3, 101:21 sort 88:5 source 29:17, 34:8, 38:15, 45:3, 45:6, 45:21, 45:24, 45:25, 46:3, 46:8, 46:11, 46:15, 46:16, 46:17, 51:4, 53:19, 54:2, 86:1 speak 8:24, 32:16, 63:17 speaking 43:2, 74:22 specific 17:20, 20:18, 48:2, 57:9, 91:14, 96:19, 96:21 specifically 7:10, 20:25, 23:16, 27:6, 42:17, 44:13, 45:6, 80:3, 80:12 specification 79:1</p>	<p>specifications 90:14 specify 104:6 spend 65:11 spent 97:6 spoke 73:15 square 40:20 squares 40:14, 40:16 src 51:4 st 79:7, 79:10, 79:15 stage 52:19, 60:6 stages 40:12, 50:15, 59:21, 60:18 start 26:21, 27:8, 28:10, 35:12, 37:11, 39:23, 47:13, 81:1, 85:14, 85:16, 87:15, 87:20 started 5:8, 89:25 starting 77:5 starts 54:3, 54:20, 54:21, 56:2, 68:21 state 4:5, 5:3, 5:18, 103:4, 105:4, 105:32 stated 24:19 states 1:1, 18:18, 88:23, 88:24,</p>
---	--	--	---

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

129

<p>90:20, 90:22, 90:24, 91:3, 91:7, 91:10, 91:16, 91:25, 92:10 stenographer 105:1 stenographic 1:31, 8:24, 11:11, 11:14, 30:7, 37:16, 41:7, 43:2, 49:18, 49:22, 51:25, 57:6, 69:8, 69:11, 69:18, 73:15, 76:22, 79:25, 85:16, 92:9, 98:24, 100:3, 100:6, 101:14, 101:17, 105:3, 105:31 step 15:25, 16:3, 16:24, 33:14, 54:4, 54:18, 66:4, 66:5, 85:20, 97:10, 97:12 steps 66:4, 85:7, 86:2, 86:5 sterne 2:3, 5:9 steve 5:10 steven 2:4 still 6:21, 17:2, 27:2, 33:16, 34:10, 52:19, 55:9, 55:19 stipulate 94:22 store 8:20, 8:21, 14:4, 17:24,</p>	<p>18:2, 18:18, 25:16, 29:1, 32:1, 34:2 stored 9:5, 32:10, 37:8, 70:19, 71:20, 72:1, 73:22 stores 19:1 straightforward 66:25, 67:9, 68:14, 68:17 street 2:6, 17:21 strike 15:10, 75:17 studio 10:22, 30:19, 30:25, 31:2, 31:3, 31:11, 31:20, 32:4, 33:14, 33:15, 41:3, 41:12, 41:17, 43:19, 43:23, 44:1, 44:4, 47:24, 51:17, 51:22, 52:10, 55:15, 57:3, 57:4, 57:7, 70:5, 70:8, 73:7, 84:1, 85:14, 85:15, 85:18, 85:19 style 17:20 subject 96:4 submit 101:19, 101:24 submitted 26:8 subsequent 27:16, 97:19 substance 102:10 suddenly 60:18, 88:9</p>	<p>sued 7:8 sufficient 21:4, 21:9, 21:16, 22:5 sufficiently 48:9 suggested 74:15 summary 38:11 sunnyvale 2:16, 4:3 supplied 56:14, 56:15, 56:19 supply 54:18 support 29:7, 35:18, 68:25, 70:10 supporting 26:22, 38:24, 61:15 suppose 46:1 supposed 102:12 sure 5:13, 6:10, 6:16, 6:19, 7:4, 8:3, 10:10, 12:16, 13:11, 18:25, 22:1, 25:25, 26:7, 29:21, 31:19, 31:20, 32:12, 34:10, 34:22, 35:8, 38:14, 64:10, 64:13, 65:12, 69:21, 71:8, 72:21, 74:11, 74:17, 74:24, 75:23, 79:15, 80:3, 80:23, 80:24, 80:25, 88:21, 93:22, 93:24,</p>	<p>94:1, 94:9, 94:15, 102:16 surprise 67:8 swf 53:9, 96:14, 96:17, 96:23, 96:24, 101:5 switching 57:15 sworn 5:3, 105:7 system 9:17, 29:11, 41:11, 41:12, 41:16, 49:13, 64:15, 81:9, 81:10, 81:24, 82:2, 87:25, 88:1, 91:2, 91:15 system's 42:4 systems 82:1</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>tab 19:9, 20:1, 84:12, 84:15 table 26:21, 38:23 tableau 1:4, 5:9, 7:6, 7:8, 104:10 tables 84:19 tabs 87:11 take 6:24, 6:25, 16:15, 65:18, 65:23, 100:15 taken 35:9, 66:11, 92:14, 99:24, 100:16, 105:9 takes 78:21</p>
---	---	--	---

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

130

<p>taking 39:21 talk 6:5, 102:10 talked 17:15 talking 21:22, 66:14, 97:6 talks 97:7 tdutton@sterneke- ssler 2:9 techcrunch 92:8, 92:10 technicalities 90:11 technically 10:18, 31:16, 41:4 technology 87:17, 89:2, 89:15 template 8:20, 9:6, 9:12, 11:17, 12:1, 13:16, 13:21, 14:17, 17:16, 18:2, 18:5, 18:9, 18:11, 18:24, 19:1, 19:15, 20:9, 20:16, 20:19, 20:21, 20:23, 21:4, 21:9, 21:12, 21:13, 21:17, 22:6, 22:11, 22:21, 23:2, 24:1, 24:16, 25:1, 25:4, 25:9, 25:12, 25:17, 25:19, 34:2, 34:6, 34:9, 34:14, 34:24, 35:2, 35:3, 37:6,</p>	<p>37:8, 38:7, 39:11, 39:16, 39:19, 39:23, 39:25, 40:6, 40:17, 40:20, 40:23, 41:4, 41:21, 42:1, 42:25, 43:10, 46:9, 70:18, 70:19, 71:17, 72:4, 72:10, 73:2, 73:22, 82:12, 82:13, 83:6, 83:8, 83:9, 83:10, 83:13 templates 8:21, 13:21, 13:23, 13:25, 14:3, 14:4, 14:5, 14:8, 17:15, 17:23, 18:4, 18:18, 19:11, 19:20, 20:5, 20:13, 20:15, 22:24, 23:5, 23:10, 23:20, 23:22, 24:10, 24:11, 24:13, 24:17, 24:19, 24:21, 24:23, 34:2, 38:9, 71:20, 72:1, 82:10, 82:14, 82:25 term 23:20, 40:21, 41:16, 65:5 terminology 58:10, 98:13 terms 90:8, 91:6 testified 5:4, 97:19, 99:9, 99:23 testify 26:17 testimony 72:22, 97:8,</p>	<p>98:14, 99:12, 102:11, 104:3, 104:5, 105:9 testing 91:18, 91:21, 92:5 text 83:15 th 4:1, 74:12, 77:17, 77:18, 78:4, 78:7, 79:14, 91:23 thank 49:22, 69:11, 74:2, 95:24, 96:5, 100:6, 101:17 thanks 96:2 themselves 70:10 thereby 9:15, 43:13 thickness 18:20, 19:3 thing 7:1, 14:20, 20:18, 24:6, 30:24, 31:15, 39:5, 39:14, 56:16, 57:10, 60:14, 65:22, 81:20, 84:9, 88:8, 99:10 things 32:22, 88:10, 88:11, 96:11 think 13:2, 21:19, 23:24, 24:24, 25:7, 25:13, 27:13, 27:23, 35:6, 35:12, 48:2, 48:9, 52:2, 60:7, 60:13, 60:23, 64:4, 66:9,</p>	<p>68:17, 83:19, 90:22, 92:12, 94:17, 95:2, 95:20, 98:12, 99:7, 100:14, 101:4 thinking 10:5, 22:8, 59:19 thought 23:14, 23:19, 24:22, 25:25 three 9:19, 29:6, 39:21, 40:2, 40:11, 40:12, 40:14 through 5:23, 23:1, 27:18, 48:2, 51:3, 51:20, 52:13, 72:18, 72:19, 79:11, 103:2 time 19:25, 20:3, 23:4, 23:20, 23:23, 24:6, 25:23, 25:24, 26:2, 27:13, 31:12, 33:3, 35:6, 47:19, 47:21, 47:23, 48:3, 48:10, 55:16, 56:15, 58:9, 59:11, 60:9, 62:12, 63:20, 65:12, 66:9, 66:21, 67:1, 68:15, 74:5, 74:15, 80:17, 85:13, 86:16, 88:14, 89:2, 89:17, 89:25, 90:1, 90:19, 91:24, 92:2, 92:7, 92:12, 96:2,</p>
---	---	--	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

131

<p>96:3, 97:6, 101:10, 102:15 times 17:19, 17:20, 91:6 timing 63:18 title 58:1, 59:8, 63:1, 104:10 titled 26:21, 87:16 today 5:10, 5:24, 5:25, 6:9, 6:13, 6:17, 7:10, 17:18, 19:19, 20:8, 24:4, 24:11, 25:2, 25:17, 25:21, 26:17, 47:17, 52:3, 83:11, 91:14, 96:2, 102:9, 102:15 together 12:7, 31:17, 33:4 top 8:14, 19:9, 45:4, 49:1, 66:2, 75:13 towards 54:5, 73:9, 79:22 trademark 1:1 transcribe 6:2 transcript 4:7, 6:11, 95:3, 95:22 transmit 9:19 trial 1:2 true 27:20, 28:9, 39:5, 96:19,</p>	<p>96:23, 105:9 truth 5:3, 5:4 try 6:5, 6:13, 20:18 trying 23:25, 72:20, 79:16, 91:5 turn 11:5, 26:11, 83:6, 83:10, 96:11, 97:24 two 9:17, 12:5, 13:2, 17:12, 22:15, 23:7, 31:5, 32:22, 47:4, 47:7, 49:12, 51:21, 58:8, 61:18, 62:19, 63:4, 64:17, 66:4, 68:24, 70:3, 70:9, 87:11, 88:10, 95:17 tyler 2:5, 5:8 type 18:6, 18:8, 19:6, 21:3, 21:8, 21:16, 21:23, 22:2, 22:5, 22:12, 22:18, 22:20, 23:18, 24:25, 25:3, 25:12, 25:14, 25:15, 25:19, 37:9, 39:23, 55:5, 60:4, 87:12 types 19:21, 20:1, 20:4, 23:6, 23:7, 23:17, 23:22, 24:2, 24:11, 24:16, 24:23, 25:14,</p>	<p>25:16, 82:11, 87:2, 87:10 typically 40:12, 85:17 tyron 89:4, 89:7, 89:10, 90:12, 91:11</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>ultimately 72:3, 88:1, 90:9 under 41:5, 41:7, 41:8, 41:10, 41:11, 41:19, 41:23, 86:15, 94:20, 95:4 underlying 81:9, 81:24, 94:25 understand 5:25, 6:3, 6:14, 6:20, 7:5, 8:2, 12:9, 21:23, 24:14, 24:24, 27:21, 31:19, 32:12, 38:15, 38:19, 61:8, 64:3, 72:22, 86:18 understanding 8:9, 8:16, 10:2, 10:19, 12:24, 16:12, 19:19, 25:11, 25:18, 25:22, 26:25, 47:23, 49:24, 63:6, 69:15, 93:23 understood 6:18, 10:8 unique 17:19 united 1:1, 88:23, 88:24, 90:20,</p>	<p>90:22, 90:24, 91:2, 91:7, 91:10, 91:15, 91:25, 92:10 unless 6:21, 95:23 until 88:7 upcoming 86:13 update 49:9, 55:10, 91:22 updated 55:11, 55:17, 56:3 updates 55:15 updating 55:14 upload 31:6 uploading 29:10 upper 48:11, 52:9, 83:15 url 51:4, 55:5, 55:6 use 10:15, 32:9, 88:2 user 9:4, 9:7, 9:13, 9:14, 9:18, 10:23, 12:11, 12:20, 12:21, 13:4, 17:24, 23:6, 30:9, 30:11, 31:4, 32:4, 33:14, 33:17, 36:2, 41:1, 41:2, 41:4, 42:3, 42:10, 42:20, 42:25, 43:1, 43:6, 43:11,</p>
---	--	--	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

132

<p>43:12, 48:13, 48:15, 48:24, 51:3, 51:7, 51:12, 51:13, 51:17, 53:3, 53:5, 54:10, 58:22, 64:3, 66:18, 70:17, 71:1, 73:20, 83:17, 84:2, 84:23 users 10:11, 31:4, 37:13, 92:4 using 9:14, 16:16, 18:3, 41:16, 43:12 utterance 8:22, 37:14, 41:6, 43:1, 49:17, 51:23, 57:4, 76:21, 79:24, 92:8, 98:21, 100:1</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>various 42:12, 57:18, 57:20, 59:8, 84:20 version 55:12, 91:19 versions 60:19 versus 17:21, 98:6, 98:7 via 57:24, 62:6 view 42:3 viewer 63:25 viewing 88:7, 88:11 vincent 2:13, 5:15,</p>	<p>35:8 vincent@wbd-us 2:17 visible 49:15, 62:20 visited 30:22 visual 70:8 visually 70:13, 70:14 vs 1:8</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wall 17:21 want 22:17, 25:8, 38:12, 38:15, 55:16, 65:20, 66:15, 94:9, 94:20, 104:4, 104:6 wanted 55:10, 64:10, 80:13 washington 2:7 wave 53:9 way 15:3, 25:8, 59:19, 64:9, 64:17, 64:19, 64:24, 83:4, 86:15, 98:12, 105:22 ways 47:7 we'll 65:23, 95:4 we're 7:10, 34:10, 79:15, 87:1, 94:17 we've 57:8, 58:13,</p>	<p>87:7 web 11:4, 32:25, 34:17, 34:18, 45:19, 54:15, 55:5, 56:7, 56:12 website 11:2, 11:3, 11:19, 16:20, 32:8, 32:20, 32:21, 36:10, 48:20, 51:15, 53:2, 72:7, 72:16, 88:4, 97:17 websites 11:18, 11:19, 15:3 weeks 34:11 welcome 35:11, 66:13 well-understood 16:13 weren't 67:15, 67:20, 68:6 whatever 55:6, 55:15, 72:20, 79:23, 80:1, 83:12, 93:7 whatever's 23:17 wherein 9:3, 9:10, 42:22, 43:8, 70:18 whereof 105:26 whereupon 102:18 wherever 53:18 whether 24:1, 24:9, 24:15, 38:20,</p>	<p>96:16, 100:19, 100:23, 101:9 whole 5:3, 18:3, 20:17, 27:13, 31:18, 98:18 willing 94:22 within 30:13, 51:13, 82:15, 105:4 witness 4:6, 5:2, 7:14, 7:17, 9:1, 10:1, 11:13, 11:15, 11:17, 12:15, 14:14, 14:20, 15:1, 15:15, 16:8, 16:23, 19:17, 21:6, 21:11, 21:19, 22:8, 25:7, 26:4, 28:2, 30:8, 33:12, 37:18, 39:18, 41:8, 43:4, 45:24, 49:20, 51:20, 52:1, 52:18, 53:17, 54:9, 54:15, 56:10, 56:24, 57:7, 58:20, 59:7, 59:18, 62:16, 63:1, 63:10, 64:8, 67:5, 67:12, 67:18, 67:23, 68:9, 68:17, 69:12, 69:19, 70:13, 71:23, 73:25, 75:11, 76:23, 78:20, 80:1, 83:4, 84:6, 85:12, 85:17, 85:25, 92:10, 92:21, 93:1, 93:22, 94:8, 95:6,</p>
--	--	--	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

133

<p>95:8, 96:4, 96:21, 98:10, 98:25, 99:13, 100:5, 100:13, 101:3, 102:7, 105:6, 105:10, 105:26 witness's 3:10, 104:1 womble 2:12, 5:14, 105:16 word 39:19, 40:7, 65:13, 83:12 wordings 48:2 words 8:7, 9:22, 10:3, 104:4, 104:6 work 45:7, 55:14, 60:25, 71:12, 73:5, 90:6 worked 10:18 working 78:1, 78:12 works 52:3, 55:23 world 15:18, 31:15 wouldn't 16:19, 38:18, 46:1, 67:8, 67:12, 71:1 wrap 15:2, 15:6, 15:20 write 20:15 writing 65:10 written 23:13, 47:18, 47:22, 48:7, 65:4, 76:11,</p>	<p>77:10, 80:15 wrote 20:10, 47:19, 48:10, 65:14, 88:2 <hr/>y <hr/>yan 1:31, 4:4, 105:3 yeah 7:23, 8:15, 10:1, 10:7, 11:15, 12:15, 13:5, 13:19, 15:8, 16:2, 16:5, 18:16, 18:22, 19:12, 20:11, 20:19, 20:25, 22:3, 22:25, 23:3, 26:3, 27:20, 28:4, 30:5, 30:15, 33:12, 34:7, 35:5, 35:20, 37:12, 39:7, 39:8, 45:14, 46:2, 50:11, 50:12, 55:14, 61:21, 61:23, 62:5, 65:13, 65:24, 67:23, 68:3, 68:9, 68:12, 69:10, 70:14, 71:6, 72:2, 72:7, 72:19, 72:25, 73:3, 75:10, 76:2, 76:4, 76:13, 76:24, 79:14, 79:15, 79:16, 80:10, 80:17, 81:6, 82:8, 82:23, 84:14, 86:21, 86:22, 86:24, 87:11, 88:2, 88:17,</p>	<p>89:25, 91:7, 91:12, 91:20, 92:3, 93:1, 94:5, 94:18, 95:2, 95:8, 96:2, 96:6, 96:25, 99:21, 101:11, 102:13 years 19:18, 23:12, 80:16 york 17:19, 17:20 yourself 31:15 youtube 52:3 <hr/>0 <hr/>01387 1:8 03 102:19, 105:17 077,728 75:13, 76:3 08 78:7 <hr/>1 <hr/>10 1:23, 4:1, 30:3, 30:14, 34:10, 70:17, 71:5, 72:24, 89:19, 91:23, 104:11, 105:16 100 3:5, 72:19, 91:12, 95:17, 98:4, 100:1, 100:5 1001 7:15, 97:5 1013 75:12, 76:7, 77:5 104 3:10</p>	<p>105 3:11, 103:3 11 33:25 1101 2:6 12 74:8 1279 2:15, 4:3 14 34:17, 34:20, 34:23, 35:13, 37:7, 38:6, 39:4, 39:10, 41:25, 45:13 14316 1:31 15 19:18, 23:11, 36:5, 36:11, 39:14, 41:14, 41:22, 41:25, 77:17, 77:18, 78:4, 78:7, 79:14 16 18:12, 20:20, 23:1, 37:9, 42:15, 42:19 17 43:16, 80:16, 80:17 18 44:14 1a 28:23, 28:25, 29:9, 29:17, 29:19 1b 34:1, 34:14, 35:1 1c 35:15, 37:5 1d 35:15, 37:6 1e 42:5, 45:2,</p>
--	--	--	---

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

134

<p>46:21, 52:5 1f 42:6, 45:3, 46:21, 52:6 1st 74:15</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 102:19, 105:17 20 20:20, 42:16, 45:4, 45:14, 46:24, 52:8, 60:5, 66:2, 66:17, 96:11 20005 2:7 2002 37:21 2004 44:14, 44:16, 44:17, 69:2 2005 39:15, 70:23 2006 87:22 2007 31:12, 34:11, 60:20, 63:20, 89:20 2008 38:6, 38:11, 38:17, 39:8, 39:11, 60:24, 61:2, 61:6, 63:20, 74:12, 74:16, 75:5, 75:19, 79:7, 90:22, 91:1, 91:23, 93:7 2009 43:17, 44:10 2014 45:9, 45:17 2015 45:10, 45:12, 45:18, 47:14</p>	<p>2017 69:4 202 2:8 2024 1:8 2025 1:23, 4:2, 26:15, 104:11, 105:16, 105:27 204 12:4, 12:6, 12:11, 12:20, 13:4, 13:7, 13:9 208 14:11, 14:17 21 23:1, 45:15, 74:2, 79:7, 79:10, 91:18 212 12:7, 12:11, 12:22, 13:5 216 11:24, 13:6, 13:18 2171 74:1, 74:2 22 23:1, 105:26 220 12:1, 13:9, 13:21, 14:1, 14:5, 14:6, 14:17 2200 26:5, 96:12 224 17:9 2473 4:8 25 42:15, 42:16, 95:15 26 68:20 2600 2:8</p>	<p>27 20:15 28 18:13, 69:5 29 74:12, 89:20 2nd 74:20, 75:5, 75:19, 100:9</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>30 57:14, 57:16, 58:3, 59:3, 61:9, 61:20, 62:22, 63:15, 63:22, 64:4, 64:20, 97:3, 97:4 31 79:15 34 4:2, 105:17 371 2:8</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>40 19:8, 19:9, 19:14, 20:24, 82:7, 82:17, 84:3, 84:11, 86:9, 87:6, 97:24, 98:5, 99:8, 99:10, 99:17 4012 18:18 43 70:16 45 76:7, 76:11, 77:10 46 77:11</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>51 95:10, 95:11</p>	<p>54 77:5 57 86:22 58 86:22 59 85:6 5th 61:2, 61:6, 79:14</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>60 75:2, 76:1 61 75:13, 76:3, 82:25, 83:1, 83:15, 84:2, 84:24, 99:9 62 86:25, 87:9, 99:16 65 27:18 67 91:20</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>71 74:2 72 26:11 73 77:7 75 95:14</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8 78:7 8,271,892 1:9, 7:24, 8:14 892 8:1, 8:8, 9:23, 11:6, 14:23, 20:12, 22:23, 23:4, 29:4,</p>
--	---	--	--

PUBLIC VERSION

Transcript of Seymour Duncker
Conducted on October 10, 2025

135

29:24, 44:23,
57:14, 58:16,
61:1, 74:25,
75:23, 76:18,
79:8, 79:20,
80:18, 81:3,
81:11, 82:17,
84:4, 84:11,
89:21

9

9

4:2, 105:17

94085

2:16, 4:3

96

3:4