1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

3

YEALINK (USA) NETWORK TECHNOLOGY)
4 CO., LTD., and YEALINK NETWORK)
TECHNOLOGY CO., LTD.,)
5)
Petitioners,)
6)
vs.) Case Numbers
7) IPR2024-01436
BARCO N.V.,) IPR2024-01437
8) IPR2024-01438
Patent Owner.) IPR2024-01439
9 _____)

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13 DEPOSITION OF

14 KEVIN C. ALMEROTH, Ph.D.

15 (via videoconference)

16 MONDAY, DECEMBER 1, 2025

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Stenographically Reported by:
23 SHANNON BORGE
RPR, CSR No. 9436
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25 Pages 1-62

BARCO EXHIBIT 2033
Yealink v. Barco
IPR2024-01438

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9 _____)

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13 The deposition of KEVIN C. ALMEROTH, Ph.D.,
was taken on behalf of Patent Owner, beginning
14 at 9:01 a.m., Pacific Time, on Monday,
December 1, 2025, via videoconference, before
15 Shannon Borge, RPR, California Certified
Shorthand Reporter No. 9436 pursuant to Notice.
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1 A P P E A R A N C E S

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1 I N D E X
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3 WITNESS:
4 KEVIN C. ALMEROTH, Ph.D.
5 EXAMINATIONS
6 Page
7 By Mr. Halverson 7
8 By Mr. Greenleaf 60
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1 E X H I B I T S

2 EXHIBIT DESCRIPTION PAGE

3 (None)

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5 INFORMATION TO BE SUPPLIED

6 Page Line

7 (None)

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9 QUESTIONS INSTRUCTED NOT TO ANSWER

10 Page Line

11 (None)

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1 VIA VIDEOCONFERENCE; MONDAY, DECEMBER 1, 2025
2 9:01 A.M.
3 * * *
4 THE STENOGRAPHER: Good morning. We are going
5 on the record at 9:01 a.m. on Monday, December 1st,
6 2025, in the matter of Yealink (USA) Network Technology
7 Co., LTD., et al., versus Barco, N.V., Case Numbers
8 IPR2024-01436, -01437, -01438, and -01439 respectively.
9 Today's deposition is taking place remotely via
10 Zoom.
11 My name is Shannon Borge. I am a California
12 Certified Shorthand Reporter representing the firm
13 Planet Depos, and my certification number is 9436.
14 The deponent is Kevin C. Almeroth, Ph.D.
15 Counsel, can you please introduce yourselves.
16 MR. HALVERSON: Eric Halverson from K&L Gates
17 on behalf of Patent Owner Barco.
18 MR. YANG: Kevin Greenleaf representing
19 Petitioner Yealink and the witness.
20 THE STENOGRAPHER: Dr. Almeroth, please raise
21 your right hand to be sworn.
22 (Whereupon, the witness was sworn.)
23 KEVIN C. ALMEROTH, Ph.D.,
24 having first been sworn by the Certified Shorthand
25 Reporter, was examined and testified as follows:

1 THE WITNESS: Yes, ma'am, I do.
2 EXAMINATION
3 BY MR. HALVERSON:
4 Q. Good morning, Dr. Almeroth. How are you this
5 morning?
6 A. Great.
7 Q. Love to hear it. So we've done this a handful
8 of times before. Same ground rules apply.
9 Any questions, concerns, issues with those?
10 A. No.
11 Q. Beautiful. For ease of everybody involved,
12 including the court reporter not needing to create
13 excessive amounts of paper, we're going to do one
14 transcript today for all four proceedings. The only
15 thing that should have any overlap there or -- or same
16 exhibit being used more than once will be your
17 declarations, all of which, at least for the reply
18 declarations, have been marked as Exhibit 1083. And so
19 when we are talking about the declarations, if you could
20 strive to identify them by proceeding number or by
21 patent number and I will do the same.
22 Does that work?
23 A. Yes.
24 Q. Otherwise, all of the other exhibits -- thanks
25 to the Petitioner's foresight -- have been labeled in a

1 manner that allows us to use the same numbers for all of
2 the proceedings. So those we can just refer to as the
3 name or the exhibit number, up to you as far as your
4 preference.
5 Does that work?
6 A. Yes.
7 Q. Any reason why you can't give truthful and
8 accurate testimony this morning?
9 A. No reason.
10 Q. And just so that we're all on the same page, do
11 you have all four declarations, the reply declarations,
12 in these proceedings available on your machine?
13 A. Yes.
14 Q. And so there's one in IPR2024-01436 for the
15 '002 patent; is that right?
16 A. Yes.
17 Q. Another one in IPR2024-01439 for the '951
18 patent; is that right?
19 A. Yes. Yes.
20 Did he freeze?
21 Q. I'm still here.
22 A. Okay. Did you hear my answer?
23 Q. She did. That's all that matters.
24 And then there's another one for IPR2024-01437
25 for the '237 patent; is that right?

1 A. Yes.
2 Q. And then the last one that we'll be talking
3 about today is in IPR2024-01438 and that's the '676
4 patent; is that right?
5 A. Yes.
6 Q. And have you reviewed these declarations as
7 part of your preparation for today?
8 A. I have.
9 Q. Is there anything in there that you would
10 change or that you believe to be incorrect that we need
11 to talk about before we dive in?
12 A. Not specifically. I think I found a couple of
13 typos as I read through them. The -- the only one that
14 comes to mind is I think the '237 declaration has the
15 wrong IPR number on it.
16 Q. When you say, "On it," where are you referring
17 to?
18 A. The cover page.
19 Q. And Dr. Almeroth, did you prepare these
20 declarations?
21 A. They -- yes, they represent my opinions.
22 Q. And the reason I ask is there seems to be two
23 different formats across the two.
24 Any particular reason why?
25 A. No.

1 Q. So if you could open up the '951 reply
2 declaration for me and go to paragraph 37, which is on
3 PDF page 27. Let me know when you're there.
4 A. I am there and I've also got paper copies too.
5 So I'll jump back and forth depending on -- okay. I've
6 got it open.
7 Q. And so the '951 declaration has this conclusion
8 section in it where you expressly state that you are not
9 aware of any evidence of secondary considerations.
10 Do you see that?
11 A. I do.
12 Q. Can you also open up the '002 declaration for
13 me?
14 A. Okay. I've got that one.
15 Q. And if you go to paragraph 21 of the reply '002
16 declaration, the "Similar Conclusion" paragraph,
17 although there's no conclusion section here, but there's
18 no statement about secondary considerations.
19 Do you see that?
20 A. I do see that.
21 Q. Are you aware of any evidence of secondary
22 considerations with respect to the '002 patent?
23 A. I am not aware of any that apply.
24 Q. So the same sentence -- the same conclusions --
25 strike that.

1 The opinion that you offer with regards to the
2 '951 patent in paragraph 37 of your reply declaration
3 applies to all four patents then, is that correct, as it
4 relates to the secondary considerations evidence?
5 A. I -- I think the idea that there aren't
6 secondary considerations that would overcome the
7 opinions I've offered on obviousness would apply to all
8 four declarations.
9 Q. And have you reviewed Dr. Brogioli's
10 declarations in these proceedings?
11 A. Yes.
12 Q. And he had a section describing the practice of
13 the patents by Barco's products.
14 Do you recall those?
15 A. I do.
16 Q. And I just want to make sure that I didn't miss
17 it. You don't respond to that or otherwise disagree
18 with those passages in your declaration; is that right?
19 A. No, not specifically. I -- I don't think that
20 those opinions establish a nexus or rise to the level of
21 secondary considerations or that he's determined that
22 the existence of this would suggest that there wasn't a
23 motivation to combine the references as I suggested, but
24 other -- other than not opining that there was no
25 secondary considerations evidence, I think that's the

1 extent of what I've offered.
2 Q. And, I guess, so in the beginning of that
3 answer you were talking about you don't think what
4 Dr. Brogioli did established a nexus; is that right?
5 A. That's correct.
6 Q. Do you describe in your declaration somewhere
7 why you don't believe that Dr. Brogioli established a
8 nexus?
9 A. Not with any specificity. I think it's his
10 burden to establish secondary considerations, and I
11 think it's -- it's actually dealt with more in the brief
12 that I -- that I didn't need to offer any additional
13 opinions.
14 Q. I just want to make sure that I didn't miss it.
15 So as far as you know, you -- you did not have a section
16 in any of your four reply declarations responding to
17 that nexus conclusion from Dr. Brogioli?
18 A. Not a specific section.
19 Q. Did you review or use any Crestron products as
20 part of your analysis that led to your preparation of
21 your four reply declarations?
22 A. I don't believe so.
23 Q. And I think you have some screenshots in here
24 about files from Barco products, but I don't see any
25 descriptions about actual use of the Barco products to

1 share or present any information on a screen.
2 Did you do that analysis as part of your work
3 on these four reply declarations?
4 A. My recollection is I did do more than just
5 install the dongle, attach it, and install the requisite
6 files. I don't think any of those opinions were -- were
7 relevant to the opinions I offered in the declaration so
8 I didn't include any sort of further formal testing.
9 Q. And did you disagree with any of Dr. Brogioli's
10 use depictions in his declaration?
11 A. Not that I specifically recall. I wasn't --
12 yeah, not that I specifically recall.
13 Q. Did you review the Crestron patent portfolio as
14 part of your work preparing any of these four reply
15 declarations?
16 A. That's a bit harder to answer. I'm certainly
17 familiar with the Crestron portfolio. I don't recall
18 undertaking a specific task beyond what I already
19 understood in the context of these four declarations.
20 Q. And so as you sit here today, can you identify
21 any opinions in these four reply declarations about the
22 content of the Crestron patent portfolio?
23 A. Let me look. The only thing I see relating to
24 Crestron is just Exhibit 1090. That's for the '002
25 patent. I'll just do a quick check. I don't remember

1 specific opinions related to Crestron, at least as it
2 related to opinions in these four declarations.
3 Q. And if you could let me know when you're done
4 with that quick check.
5 A. Sure. I'm just searching through for Crestron
6 and then searching for 1090 since it's the exhibit
7 number. I don't see anything specific at least in these
8 four declarations.
9 Q. And 1090, just so that we're all on the same
10 page, is the deposition transcript of Mr. Andrew Ludke;
11 is that right?
12 A. Yes.
13 Q. And you did not find a citation to 1090 in your
14 reply declarations, any of the four of them; correct?
15 A. That's correct.
16 Q. And, Dr. Almeroth, you're not offering any
17 opinions about Crestron's marking practices, are you?
18 A. I don't believe so.
19 Q. Or Barco's marking practices?
20 A. In these declarations, I don't recall there
21 being something like that.
22 Q. And then am I correct that all of the grounds
23 of unpatentability that you are opining on are
24 obviousness grounds; is that right?
25 A. I believe that is correct.

1 Q. Instead of the four patents that are at issue
2 in these four IPR proceedings, do you agree that they
3 are all from the same field of endeavor for the purposes
4 of the obviousness analysis that you've undertaken?
5 A. I would think they generally would be.
6 Q. And what is that field of endeavor?
7 A. I don't know that I've attempted to articulate
8 what that was. I know the one that this seemed to come
9 up as particularly relevant was for the '237 patent and
10 I had recalled looking at that. So I think there's a --
11 a technical background section in the '237. I think
12 there's going to be at least a similar background
13 section in some of the other patents. I haven't checked
14 to see if they overlap.
15 But for the '237 patent, it starts about
16 Column 1, line 22, and extends until about Column 5. It
17 says there's some discussion of relevant technologies in
18 those sections, and then actually in the '237 patent,
19 there's also definitions in Column 12. It mentions
20 things like plug-and-play interfaces, auto
21 configuration, hot swapping, and hot plugging, portable
22 application, and then goes on from there. There's a
23 whole section probably through to Column 14. Those
24 terms also help establish kind of what was in the -- the
25 technical background or -- or the area.

1 Q. Do you offer an opinion on what the field of
2 endeavor of the four patents at issue in these four
3 proceedings is?
4 A. I don't recall exactly what's in the
5 declaration. There's some discussion of the patents
6 themselves. I don't recall being asked to formally
7 identify a field. Again, the one where I thought it was
8 relevant was in '237 where I think Barco and
9 Dr. Brogioli disputed the relevance of the Mardiks
10 reference, M-a-r-d-i-k-s, so I probably referenced it at
11 least in the context of the '237 declaration.
12 Q. And when you say the '237 declaration, do you
13 mean your reply declaration or your opening declaration?
14 A. Certainly in the reply declaration. There --
15 there might be additional support or discussion in the
16 opening declaration. I think generally across all of
17 the declarations, all eight at issue for this
18 deposition, described the technology of the patents and
19 likely at least informally, if not formally, describes
20 what they were about.
21 Q. And so if we go to that '237 reply declaration
22 and go to paragraph 6 -- I think this is the section you
23 were talking about -- here you say that both Mardiks and
24 the '237 patent, quote, "concern using similar USB
25 peripheral devices."

1 Do you see that in the first sentence there?
2 A. I do.
3 Q. And so is that the field of endeavor for the
4 '237 patent, "USB peripheral devices"?
5 A. I think USB peripheral devices are within the
6 field of endeavor. I don't know that the -- to borrow
7 terminology from claim construction, that the metes and
8 bounds of the field of endeavor would be simply about
9 USB peripheral devices, but certainly the '237 patent,
10 especially in the portions that I described, feature USB
11 peripherals and their operation prominently. So it
12 would at least be -- or, USB peripheral devices, the USB
13 standard, USB device operation, discovery, connecting,
14 all of the kinds of functions related to USB, I think
15 would be within the scope of the field of endeavor of at
16 least the '237 patent, if not all four of the patents at
17 issue today.
18 Q. And what is the particular problem that the
19 '237 patent is addressing?
20 A. That is actually a good question. I have heard
21 statements from Barco and Dr. Brogioli that they are
22 attempting to deal with ease of use, security, and being
23 platform agnostic, though I think I've offered the
24 opinion that those kinds of -- that solutions existed
25 that already provided those kinds of features in the

1 state of the art. So it's actually unclear to me what
2 specifically the Barco patents are attempting to solve
3 that wasn't already addressed in the state of the art
4 and in prior art.
5 Q. So when you came up with the heading just above
6 paragraph 6 where it says, "Mardiks is reasonably
7 pertinent to the particular problem," what problem were
8 you referring to there?
9 A. The problem as it's articulated in the
10 specification of the '237 patent.
11 Q. And where is that problem articulated?
12 A. In the technical background. The one that
13 comes to mind is about Column 2, line 21, of the '237
14 patent specification again. It says, "The conclusion is
15 that despite the plethora of electronic aides to
16 meetings, fundamental problems in handling meetings have
17 not been solved. In fact, organizing and conducting
18 meetings in a business context involves a large number
19 of factors," and then it goes on to list a -- a bunch of
20 factors that I think Barco has attempted to summarize.
21 Q. Anywhere else that you looked to for the
22 particular problem that you were referring to there in
23 that section?
24 A. Well, then, again, like I said, that section
25 continues. There's a scalability and ease of use

1 section and that includes Column 4, about line 7, where
2 that paragraph begins "an alternative method in the
3 making today is to use the well-known USB interface of
4 the computer for extracting display content of the
5 computer," and so it goes on there. That's one example
6 listed in the -- the subheadings under ease of use and
7 scalability.
8 Q. Is there anything in any of the other three
9 patents that stood out to you in addition to the content
10 that was the same from the '237 patent that would have
11 altered that particular problem for the other three
12 patents?
13 A. Not that I specifically recall.
14 Q. Let's go one more paragraph in this same '237
15 reply declaration. We see subheading "B." Let me know
16 when you see that.
17 A. I'm there.
18 Q. This talks about a, quote, "finite number of
19 identified predictable solutions."
20 Do you see that?
21 A. Yes.
22 Q. How many identified predictable solutions are
23 you aware of?
24 A. I would say that the most common kinds of
25 solutions would come through USB and the different

1 classes of USB devices. So there's probably three or
2 four or half a dozen relevant classes within USB that
3 you can use for communicating data, at least in terms of
4 the main ones. So I think a person of skill in the art
5 would kind of think of those main ways of communicating
6 data within USB as -- as being predictable solutions.
7 Certainly there's also predictable solutions
8 not limited to the USB protocol, but I think those
9 become less relevant so I haven't tried to do any
10 particular accounting. But I think within the technical
11 skill level of a person of skill in the art, there's
12 maybe up to ten or a dozen key ways in which data could
13 be communicated from a peripheral device or through a
14 peripheral device.
15 Q. And are those ten or a dozen unique to USB?
16 A. No. I think that it's -- it's kind of multiple
17 tiers is the way I would think about it. In the context
18 of USB, there's the type of class -- device classes
19 defined by the USB standard. There are the ones that
20 would be more likely to be used in the context of
21 something like Kaplan that I've identified here in the
22 declaration. I think a person of skill in the art would
23 probably at least consider some of the other ones and
24 have an understanding of the pros and cons of using the
25 different USB device classes and types of drivers for

1 USB for different kinds of data transfer.
2 The ten to a dozen are then moving outside of
3 kind of the inner circle of obvious uses of USB to then,
4 you know, using other kinds of protocols or certainly it
5 would be within the purview of a person of skill in the
6 art to design their own customized solution to the
7 extent that was necessary, but now I think you've moved
8 fairly far afield of the direction that a person of
9 skill in the art would take from a reference like
10 Kaplan.
11 Q. What are those three classes -- three or four
12 or half a dozen USB classes?
13 A. I don't have the USB standard in front of me.
14 I can -- you can provide it. I can go ahead and look
15 them up. There's at least the ones that are mentioned
16 throughout the -- the declaration. The two that come to
17 mind are the human interface device class. I think
18 there's also a mass storage device class. And I think
19 there's probably a couple of other ones mentioned in the
20 declarations. Those are the ones that -- that come to
21 mind. I can search through the declarations and try and
22 find the ones that I have in mind.
23 Q. Are you familiar with the class codes that USB
24 uses?
25 A. I -- I am familiar that there are class codes.

1 I don't have them in mind though. I don't have the
2 whole list memorized.
3 Q. Does 03h sound correct for the class code for
4 the Human Interface Device?
5 A. I -- it does not ring a bell.
6 Q. Are you aware of any subclasses within a base
7 class for a USB device?
8 A. Yes, that sounds familiar.
9 Q. Do you know how many subclasses there are on
10 average per base class?
11 A. No. I -- I don't have that -- that detail in
12 mind.
13 Q. Would this information all be online on the USB
14 org website?
15 A. I think it's pretty well set forth in the USB
16 standard, like a 3.0 standard or one of the earlier
17 ones. I haven't compared the publication dates to see
18 which one would have been relevant in the context of the
19 priority dates here. I -- I thought it was 3.0, but
20 I -- I don't recall specifically. I don't -- hold on.
21 I think for exhibit numbers -- I'm just going to check.
22 One of the dec- -- the declarations, it doesn't look
23 like the declaration in its list of exhibits identifies
24 the USB stack so I -- you'd have to give it to me if you
25 wanted me to look at it.

1 Q. Does 25 seem like the right number of defined
2 class codes?
3 A. I -- I don't have a number in mind so you'd
4 have to get me the specs so that I could look at it.
5 Q. Would that be helpful for you, to look at the
6 specs?
7 A. If you want to ask me questions about it.
8 Q. What's your understanding of how many
9 identified predictable solutions can exist and still be
10 a finite number?
11 A. I -- I don't have a particular answer for you.
12 I think at least in the context of these declarations,
13 the options within the USB standard are pretty well
14 understood so it could potentially cover a fairly broad
15 range given the maturity of the technology that's being
16 applied in the context of the prior art.
17 Q. When was the 3.0 spec adopted?
18 A. I don't recall that date. My recollection is
19 it was mid-2000's to 2010 time frame.
20 Q. Can you go to paragraph 10 of this '237 reply
21 declaration for me.
22 A. Sure. I'm there.
23 Q. You have some screenshots there; right?
24 A. Yes.
25 Q. You say that -- in paragraph 10 you confirm

1 that Barco installed several files permanently after you
2 connected a ClickShare dongle to your PC.
3 Were those files required to be installed?
4 A. Yes. I -- I did not see any options when I
5 clicked through, but it gave me an option of not
6 installing those files. And so I --
7 Q. So it's your understanding that -- sorry. Go
8 ahead. I didn't mean to interrupt you. Go ahead.
9 A. No. My -- my screen froze for a second. I
10 don't know if I'm -- my video's still going.
11 But I didn't see any options where I could
12 choose not to install those files.
13 Q. And if, in fact, you were not required to
14 install those files, what would that do to your
15 opinions?
16 A. I don't think it would really change any of my
17 opinions. I mean, what's -- what's interesting here is
18 I believe Dr. Brogioli and Barco are making an issue
19 about the lack of combinability of references based on
20 this idea that references like Kaplan require, as part
21 of the invention, installing files and it would be
22 inconsistent to consider a reference like -- I believe
23 it's Deforche that uses preinstalled generic drivers. I
24 -- I disagree with those characterizations. Those
25 aren't really requirements of the claim. They are

1 characteristics of the invention of the under- -- the
2 references I've relied on for invalidity.
3 And then ultimately with respect to what even a
4 definition of zero configuration or zero footprint would
5 be, Dr. Brogioli seems to have taken different positions
6 with respect to what can be allowed to be installed
7 versus not, which is inconsistent with the way that
8 Barco's solution works and is inconsistent with what the
9 references describe.
10 It -- it seems to be this -- this whole kind of
11 manufactured reason why references wouldn't be combined
12 that I don't think is supported by the references or the
13 understanding a person of skill in the art would have
14 about those references.
15 Q. Why is Barco's product operation relevant to
16 whether or not two references that are not Barco
17 references would be combined?
18 A. It's relevant because Dr. Brogioli is
19 characterizing zero footprint in ways -- sorry -- Dr. --
20 let me start over.
21 Dr. Brogioli is characterizing zero footprint
22 in a way that is inconsistent with what Barco does and
23 how he's defined it and how he's characterized the
24 products and then inconsistent with how he has applied
25 that term with respect to the prior art, and so the fact

1 that there isn't some clear-cut definition as to what he
2 means by zero footprint in the different context in
3 which he uses it creates an issue with respect to how
4 he's trying to apply that term to the prior art to even
5 get to the point of suggesting that there wouldn't be a
6 reason to combine the references, let alone that it
7 would be antithetical to the goals of the reference,
8 which it's not.
9 Q. So you used two different concepts the last two
10 answers, one being the invention of the references and
11 one being the goal of the references.
12 Is there a difference between those two
13 concepts in your mind?
14 A. Yes, there are -- there is.
15 Q. What is the difference? Sorry. Didn't mean to
16 interrupt. Go ahead.
17 A. No. That was it and then you were going to ask
18 for clar- -- for an explanation and I can do that if you
19 want.
20 Q. I would love it if you could. What is the
21 difference between those two concepts?
22 A. Sure. So the fact that a reference like Kaplan
23 describes using software as just the way that it
24 operates, it is not part of its invention in terms of
25 saying that a distinguishing aspect of its solution is

1 the fact that it goes through and installs software
2 means that you can combine it with references where the
3 software that it's relying on could already be
4 preinstalled and available for use. So the idea that a
5 person of skill in the art wouldn't combine the
6 references because it would undercut a goal of Kaplan
7 means that it's important to distinguish Kaplan's
8 operation and the reliance on -- on existing features or
9 products or tools as compared to some aspect of its
10 invention is important to consider in the combinability
11 of references.
12 Q. And so when you're discussing what the, quote,
13 "invention of a reference like Kaplan is," what do you
14 look at?
15 A. A good place to look at would be the claims.
16 Q. And for a prior art reference that is not a
17 issued patent, why is the claim indicative of what the
18 invention is?
19 A. Because that's where you get to what the
20 invention description is.
21 Q. Sorry. That was an unclear question. Let me
22 -- let me try it again.
23 For a prior art reference that is a
24 publication, a pre-grant publication, why is the
25 applicant's articulation of its invention relevant to

1 what the actual invention is?
2 A. I don't understand the question. You're
3 seeming to draw a distinction between what the invention
4 is as it's stated in the reference as compared to what
5 the inventor thinks the invention is?
6 Q. So have you ever filed a patent, Dr. Almeroth?
7 A. There is an application with my name on it, but
8 I wasn't particularly significantly involved.
9 Q. Are you familiar with the process by which
10 patents are obtained by applicants?
11 A. Generally.
12 Q. So if somebody puts together a specification
13 and a -- a claim and then they file that with the patent
14 office; right?
15 A. They would.
16 Q. And then the patent office does some prior art
17 searching and comes back with a rejection, and then
18 either amendments or arguments are made in response to
19 that rejection; right?
20 A. That could happen.
21 Q. And you've reviewed prosecution history before
22 where that does happen; right?
23 A. I -- I have.
24 Q. And so ultimately at the end of the process,
25 oftentimes the claims at issue from the patent office

1 are different than the claims that are originally filed;
2 right?
3 A. That may happen.
4 Q. And you've seen that happen multiple times?
5 A. I have seen amend- -- amendments multiple
6 times.
7 Q. And so the quote/unquote "invention" in the
8 patent publication, before any of those amendments have
9 happened, is different than the invention of an issued
10 patent after those amendments have happened; right?
11 A. It could be.
12 Q. And so when you were describing what the
13 invention was and you said, "Look at the claims," at
14 what point in time are you supposed to look at those
15 claims?
16 A. You can look at them as part of the
17 application. It's what a person of skill in the art
18 would have understood as part of what the invention is.
19 You also seem to be characterizing my answer as only
20 looking at the claims, which is not what I said
21 previously.
22 Q. Let's circle back to the other things that
23 people look at. I was trying to get a handle on when
24 you're looking at the claims what exactly it is that
25 you're doing, but it sounds like -- and by all means

1 push back, but it sounds like, at least when you're
2 looking at the claims, you're gathering a sense of what
3 the applicant understood their invention to be
4 regardless of what time -- or, what point in time you
5 were doing that looking; is that right?
6 A. I -- I thought you generally had it right until
7 the last clause of your characterization. I think a
8 person of skill in the art would look at a reference as
9 of the date that you're considering the alleged priority
10 date for the patent and would consider the -- the
11 disclosures for what they said at that point in time.
12 And so, as I said, one of the places you could look to
13 understand what the invention was alleged to be for a
14 patent application and that's something that could be
15 considered. It's certainly a part of the four corners
16 of the document and something a person of skill in the
17 art would look at.
18 Q. And so in addition to the claims, what else do
19 you look at when you're figuring out what the invention
20 of a prior art reference is?
21 A. Generally, the reference. I don't see any
22 reason why there wouldn't be an aspect of the invention
23 or the disclosure, the -- the exhibit, that you wouldn't
24 look at.
25 Q. And so how did you figure out what parts were

1 part of the invention and what parts were not part of
2 the invention?
3 A. I don't recall that I ever said that I looked
4 at a reference and said there were parts of it that were
5 not part of the invention.
6 Q. Do you have the '002 declaration -- excuse me
7 -- the '002 reply declaration still up?
8 A. Give me a second. I have it.
9 Q. Can you go to paragraph 7 for me. It's on PDF
10 page 9.
11 A. Paragraph 7. Okay.
12 Q. Where you say, "It's my opinion that Kaplan's
13 use of the word 'install' is nonlimiting to the
14 disclosure and is not a requirement to implement
15 Kaplan's system," do you see that?
16 A. I do see that.
17 Q. And so what is it about Kaplan's use of the
18 word "install" that it takes that concept out of the
19 scope of the invention of Kaplan?
20 A. I'm not sure I would agree with your
21 characterization. It says -- what you said was
22 different than what my opinion is with respect to what
23 the sentence says.
24 Q. So is the concept of installing part of the
25 invention of Kaplan?

1 A. Well, it's described in an embodiment, but with
2 respect to the novelty or the requirement to implement
3 Kaplan's system, it's not a requirement. In other
4 words, there's nothing in achieving the invention of
5 Kaplan that would require some sort of installation.
6 You can certainly use preinstalled drivers if you
7 wanted. In fact, there's also the concept of a person
8 of skill in the art applying their ordinary knowledge
9 and creativity when it comes to looking at a reference
10 and understanding what it discloses and what would be
11 obvious beyond what the disclosure is.
12 Q. And so what was it about Kaplan's use of the
13 word "install" that allowed you to arrive at the
14 conclusion that Kaplan doesn't require some sort of
15 installation?
16 A. Let's see. I'm going to go pull up a version
17 of Kaplan.
18 Q. 1027, although I suspect you're already there.
19 A. I am not. I have to get to the right folder.
20 Okay. Paragraph 22.
21 Q. Sorry. Just so that we're all -- all aligned
22 and the transcript is clear, you're at paragraph 22 of
23 Kaplan; is that right?
24 A. Yes.
25 Q. And what about paragraph 22 --

1 A. So this is a good example of -- where it says,
2 "In some embodiments, for the first time the software
3 may be uploaded to and installed on the computer,
4 automatically in some embodiments using the installed
5 software," and then it goes on from there.
6 Paragraph 23, "The ease of installation and use
7 enables users that are not particularly technolog- --
8 technology savvy to enjoy the benefits more widely.
9 Present video footage as an example."
10 And so in the context of embodiments that are
11 described here and what's described as part of
12 installation, the whole idea is describing ease of use
13 as the objective, and so whether or not in some
14 embodiments that software is installed or could be
15 automatically installed or was preinstalled, those are
16 the kinds of things a person of skill in the art would
17 consider when reviewing Kaplan. So --
18 Q. And so the -- I didn't mean to interrupt. I
19 thought you were done. Go ahead.
20 A. No. Go ahead. That's fine.
21 Q. I was going to say so because this installation
22 is in the context of an embodiment of Kaplan, is that
23 what allows you to say that it's not a requirement of
24 Kaplan?
25 A. No. I think that oversimplifies the disclosure

1 and so, you know, really it's the idea of ease of use
2 being described here in the context of Kaplan. We've
3 really only looked at a couple of paragraphs, but
4 generally the idea that Kaplan is describing ease of
5 use, it's describing embodiments where you can install
6 software automatically. And so that's where a person of
7 skill in the art would understand that when it comes to
8 the software and the kinds of drivers that are needed to
9 facilitate communication, there exists other solutions
10 that also provide ease of use that would be available to
11 a person of skill in the art and would come to mind in
12 terms of alternatives to what's being specifically
13 described in the context of Kaplan.
14 The argument that Dr. Brogioli seems to be
15 making, that there wouldn't be a motivation to combine
16 these references because it would undercut the objective
17 of Kaplan or be antithetical to the goals of Kaplan, is
18 -- is not valid in the context of some of the examples
19 of where Kaplan uses the term "install" and what it's
20 trying to achieve through that automatic installation.
21 Q. Does Kaplan describe an alternative way beyond
22 the automatic installation of achieving that goal?
23 A. I -- I'd have to look. There is the
24 boilerplate paragraph at 65. There is modifications
25 or -- I'd have to look. There might be additional

1 embodiments that are disclosed. The existence of those
2 embodiments aren't necessary to support my opinion. I
3 think they're -- the motivation is already pretty clear
4 in the context of what's described.
5 Let's see. I'd have to see if there's
6 additional descriptions. There's paragraph 65 that
7 talks about the idea that various modifications or
8 changes could be made. I think that's useful to
9 understand the flexibility that a person of skill in the
10 art would understand could be applied to a reference
11 like Kaplan. I think that the motivation is pretty
12 strong as set forth in at least the opening declaration.
13 Q. Can we go back to the '237 declaration,
14 paragraph 10, talking about that software. Let me know
15 when you're there.
16 A. About paragraph 10, I think it was? Is that
17 right?
18 Q. Yep.
19 A. Okay. I'm there.
20 Q. And you had said that if, in fact, these
21 applications were not required to be installed, it would
22 not have changed any of your opinions; is that right?
23 A. I think that's right.
24 Q. And so what was the purpose of including these
25 screenshots if -- if whether or not these screenshots --

1 or, whether or not the arguments that you're making in
2 this paragraph are correct don't have any impact on what
3 you're opining about?
4 A. Sure. Let me try and articulate it as clearly
5 as I can. So what this goes to show is that Barco's
6 product, which I think Dr. Brogioli and Barco
7 characterized as being zero footprint, actually install
8 additional files.
9 Now, there's -- these additional files, though
10 it's not clear which ones you said would have been
11 optional, I haven't seen any evidence in the record that
12 they are, in fact, optional. So it's a bit of a
13 hypothetical. I think that there are additional files
14 that are installed beyond even the startup files that
15 are described so I -- I haven't seen any evidence in the
16 record that there aren't some files that are installed
17 permanently.
18 Okay. Then the next point is -- so when
19 Dr. Brogioli and Barco characterized something as being
20 zero footprint, they're actually suggesting that things
21 like drivers and other software could actually be
22 installed but still be zero footprint. So what that
23 means is regardless of whether or not Barco's products
24 install additional files beyond drivers as an example,
25 Dr. Brogioli has taken a fairly broad position as to

1 what it means to be zero footprint.
2 What that then means is the whole idea that
3 there wouldn't be a motivation to combine references
4 like Kaplan and Ahmed and Deforche is not actually a
5 valid concern given that the zero footprint allows for
6 the installation of some files. That's kind of that
7 line of analysis and reasoning.
8 There's a -- a parallel disagreement with
9 Dr. Brogioli and Barco that it wouldn't be obvious to
10 consider things like preinstalled generic drivers as an
11 alternative to what Kaplan discloses and would have been
12 obvious to a person of skill in the art for the reasons
13 set forth, and the idea that even incorrectly
14 characterizing two of those references as zero footprint
15 and one not is -- isn't really a label that's accurately
16 being applied. And so the whole basis for suggesting
17 these references wouldn't -- there wouldn't be a
18 motivation to combine I think is wrong.
19 And then there's sort of a third reason that
20 relates to this whole thing which goes to the idea that
21 pre-install -- or, installing software is a requirement
22 of the invention that a person of skill in the art would
23 not seek to improve upon given the goals of Kaplan.
24 It's not a distinguishing feature of Kaplan that a
25 person of skill in the art would understand Kaplan was

1 trying to preserve as part of the invention given that
2 Kaplan actually said that there was embodiments that
3 didn't require installing software. Only some of the
4 embodiments involved installing software.
5 Q. And so is it your opinion that when the Barco
6 patents use the term "zero footprint," that's in
7 relation to all software associated with the Barco
8 ClickShare?
9 A. You froze. I didn't hear the question.
10 Q. Oh, no. Is it your opinion that when the Barco
11 patents use the term "zero footprint," that's in
12 relation to all software associated with the ClickShare
13 product?
14 A. You'd have to give me a claim where that term
15 shows up to be able to give you some context for an
16 answer.
17 Q. I don't know that it shows up in very many
18 claims at all, but it seems to be a focal point of your
19 declaration, which is why I'm asking about it.
20 And you were talking about how a zero footprint
21 allows for the installation of certain things, and I'm
22 just wondering whether or not, as you hear that term,
23 does it mean that there can be any installation of
24 product -- or, of software or no installation of
25 software or some installation of software?

1 A. So -- so I don't think I ever used the term
2 "zero footprint" in the context of my original
3 declarations. If I'm wrong, you can point me to where
4 I've used it.
5 The -- the reason why it features heavily in
6 the reply declaration is because Dr. Brogioli and Barco
7 have featured it prominently as a basis for why things
8 shouldn't be combined. So I think Barco and
9 Dr. Brogioli have introduced the term and actually used
10 the term inconsistently and unclearly when it comes to
11 how they're actually defining the term.
12 So when you asked me whether or not it would
13 allow -- zero footprint would allow for installation of
14 additional software, I don't think I've tried to define
15 the term. I think I've primarily taken issue with
16 Dr. Brogioli's use of the term -- inconsistent use of
17 the term, misapplication of the term to the references,
18 using the term as a basis to suggest there wouldn't have
19 been a motivation to combine references.
20 So I think the kinds of opinions that you get
21 are -- are in response to the -- this specter of zero
22 footprint that I think Dr. Brogioli has -- has
23 initiated.
24 Q. So you're not offering an opinion about what
25 zero footprint means; is that fair?

1 A. I'd have to go back and check the declarations.
2 I think you might have actually asked me about it in the
3 first round of depositions. I -- I don't recall if
4 there is something across all of the declarations that
5 says something more about what it specifically requires
6 or not.
7 Q. As you sit here today, though, you're not sure
8 whether or not you have?
9 A. I mean, we're talking about eight declarations
10 and hundreds of pages. I -- I don't, again, have --
11 have them memorized to the point of everything I've said
12 about zero footprint.
13 Q. The software files that are reflected in
14 paragraph 10, are those drivers?
15 A. Some are drivers; some are not. And there's
16 multiple figures there and many of those are not
17 drivers. So there -- there are both.
18 Q. So let's start with the first one, the first
19 figure that's got the red boxes in it.
20 Do you see that?
21 A. I see that.
22 Q. Which ones are drivers?
23 A. The ones that are in the driver directory are
24 drivers. There's the driver store. With respect to the
25 DLLs, based on the names, those don't look like they're

1 providing driver functionality.
2 Q. And are those drivers that are used to convey
3 audio information?
4 A. It's hard to tell just based on the file names
5 what they're doing.
6 Q. And do you know which ClickShare dongle version
7 you used that went to this installation?
8 A. Sorry. You broke up again.
9 Q. Do you know which ClickShare dongle version you
10 used that led to the installation in paragraph 10?
11 A. Not sitting here right now. I don't remember
12 what it was. It was the -- the most recent one.
13 Q. And so the screenshot in Figure 10 is of your
14 file explorer; right?
15 A. Yes.
16 Q. And so the modification dates there are the
17 dates that the software arrived on your machine; is that
18 right?
19 A. No.
20 Q. And how do you know that?
21 A. Because I believe when I did this, it was
22 around the middle of October, and you can see on the
23 next page, it has dates like 10/15. Those look like the
24 install dates, but for the drivers, some of the dates
25 are from June 11th, 2024. Those would have been before

1 when I did the installation, and my recollection is I
2 did them -- I -- I did the install and testing very
3 close to the date when the declaration was submitted.
4 So October 15th was when it was signed. Very close to
5 the date would be on that date or within a couple of
6 days before.
7 Q. On that same screenshot in paragraph 10 with
8 the red boxes, there's a CD drive, your (D:) drive.
9 Do you see that?
10 A. I see that.
11 Q. Is that actually a CD disk drive?
12 A. It is not.
13 Q. Do you know why it says, "CD drive"?
14 A. It's probably however the -- the computer
15 mounted the -- the dongle.
16 MR. HALVERSON: We've been going a little over
17 an hour. Let's take a quick break to stretch our legs.
18 THE WITNESS: Sounds good.
19 MR. GREENLEAF: Thank you.
20 (Whereupon, a recess was taken.)
21 THE STENOGRAPHER: Back on the record.
22 BY MR. HALVERSON:
23 Q. Dr. Almeroth, if you could go to the '002
24 declaration for me, the reply declaration for that.
25 A. Okay.

1 Q. You've got a sentence in paragraph 5 that I
2 think is in line with what we were just talking about
3 before the break, but it says, "In my opinion, the
4 patent owner's argument attempts to confine the prior
5 art solely to what if explicit disclosures."
6 Do you see that?
7 A. I do.
8 Q. And so when you undertook your four obviousness
9 analyses in these four proceedings, am I right to
10 understand, then, that your interpretation of the art
11 was beyond the disclosure of the reference?
12 A. Well, I think what this sentence is referring
13 to is you first look at what a reference discloses, and
14 then you can consider the ordinary skill and ordinary
15 creativity of a person of skill in the art as they would
16 read the reference.
17 Q. As they would read the contents of the
18 reference, the disclosures of the reference, or as they
19 would attempt to implement the reference?
20 A. Again, I think a person of skill in the art
21 would read the reference, understand its disclosures and
22 what -- its teachings, and then could apply their
23 knowledge and ordinary creativity to understand how --
24 either in the course of implementing a version or
25 considering ways in which it could be implemented would

1 seek guidance from additional reference -- references in
2 how to implement specific functionalities, sort of the
3 general course of analyzing a reference to understand
4 how a person of skill in the art might be motivated to
5 either enhance the reference or alter the reference or
6 just additional details that they would rely on their
7 knowledge for purposes of implementing the reference.
8 Q. Have you ever opined the two references should
9 not be combined?
10 A. Yes, I believe I have.
11 Q. And what are some reasons why a person of
12 ordinary skill in the art would not combine two
13 references?
14 A. Generally, the idea is -- the one that comes to
15 mind is that there is a particular objective of the
16 primary reference that would be undermined by
17 considering -- by trying to combine it with a secondary
18 reference. That's one that comes to mind.
19 Q. And -- and you're familiar with the concept of
20 teaching away; right?
21 A. I am.
22 Q. And in the example you just gave, the thing
23 that came to mind, you're not saying that that level of
24 disclosure, the particular objective that would be
25 undermined by combining it with a secondary reference,

1 you're not saying that that is teaching away; correct?
2 A. I -- I -- what I had in mind and was attempting
3 to explain when you first asked the question is not
4 something I would have considered to be teaching away as
5 I understand the current incarnation of the requirement
6 of teaching away.
7 Q. And so other than situations where there's a
8 particular objective of a primary reference that would
9 be undermined by trying to combine it with a secondary
10 reference, are there other reasons why one would not
11 combine two references?
12 A. I'm sure there are. Incompatibility of the
13 references is another example that comes to mind. I
14 don't have a specific set of -- of reasons in mind as I
15 sit here now.
16 And, again, I've sort of really focused on the
17 arguments that Dr. Brogioli and Barco have made as to
18 the reasons why references and these particular
19 references wouldn't be combined and I disagreed with
20 those positions and then responded to them accordingly.
21 Q. Paragraph 7 of the '002 reply declaration, you
22 describe the word "install" in the context of Kaplan as
23 nonlimiting.
24 Do you see that?
25 A. In six?

1 Q. Seven.
2 A. I'm sorry.
3 Q. It's not in six. I promise.
4 A. Yeah. That's why I -- I got lost. Yes, I see
5 that. That's the paragraph you asked about before.
6 Q. And so we were talking about what it was to be
7 a requirement to implement Kaplan's system, and I'm
8 curious about what you mean when you say non-limiting to
9 the disclosure.
10 What -- what did you use to determine whether
11 or not a word was limiting to the disclosure?
12 A. It's basically what I described already. So in
13 reference to when you asked me about that exact sentence
14 previously, it's going to be the aspects of Kaplan that
15 I already talked about. I think it was in paragraphs 22
16 and 23 where the idea of if you search for the word
17 "install," it usually comes up in the context of
18 different embodiments and alternatives to the ways in
19 which Kaplan could be implemented. And so I think a
20 person of skill in the art reading the reference would
21 not understand that the idea of having to install
22 software was something that was a limiting requirement
23 to Kaplan's system, that a person of skill in the art
24 would ultimately come to the conclusion that you could
25 use preinstalled generic drivers. You could use

1 preinstalled software as opposed to going through the
2 step of having to install software as it's described in
3 some embodiments, including automatically installed in
4 some embodiments, all for the purpose of achieving the
5 objective of easy to use as it says specifically in
6 paragraph 22 of Kaplan.
7 Q. So the -- the non-limiting clause in that
8 sentence is the same as the requirement to implement
9 clause in that sentence in your opinion?
10 A. No, I don't think that they mean exactly the
11 same thing.
12 Q. So the -- the -- in our prior conversation, I
13 was asking about the requirement to implement and now
14 I'm asking about the non-limiting. And in response to
15 what it means, you said it's the same thing that you had
16 already talked about, and so can you describe for me the
17 difference, then, between whether or not a word is
18 non-limiting to the disclosure and whether or not a word
19 or a concept is a requirement to implement a system?
20 A. So non-limiting to the disclosure would have to
21 do with the idea that it wasn't required in all
22 embodiments, that it wasn't a foundational aspect of
23 what the invention is, that it's actually a tool to
24 achieve the objective of easy to use, and that's the
25 same paragraph I would point you to when you asked about

1 implement -- requirement to implement.
2 Q. And so when you offered opinions about Kaplan,
3 for example, and you were describing the embodiments of
4 Kaplan that you were relying on for your obviousness
5 analysis, did you provide motivations to combine the
6 different embodiments within Kaplan?
7 A. My mo- -- my initial declaration didn't rely on
8 some distinctive aspects of different embodiments as a
9 basis for invalidity. It was as the invention of Kaplan
10 is described. I understand your attempt to create some
11 uncertainty with respect to whether or not you needed to
12 combine embodiments. That's not some requirement that I
13 believe is necessary for a person of skill in the art to
14 understand the disclosures in Kaplan. Again, the
15 overall function as it relates to Kaplan is about ease
16 of use and Kaplan describes different ways of
17 implementing ease of use in the context of paragraph 22.
18 The point here is that one of the ways to
19 facilitate Kaplan's goal of ease of use is to use
20 preinstalled software instead of software that would be
21 automatically installed and such a solution would
22 ultimately be obvious to a person of ordinary skill in
23 the art for the reasons set forth in the declarations.
24 Q. Could you go to paragraph 13 of the '002 reply
25 declaration for me.

1 A. Okay. I'm there.
2 Q. First sentence -- I guess it's the end of the
3 first sentence concludes "drivers to drive their
4 respective peripheral devices."
5 Do you see that?
6 A. I do.
7 Q. What does that mean, "drivers to drive"?
8 A. Drivers that provide the software to interface
9 with the various hardware peripherals and to provide the
10 kinds of functionality described in the corresponding
11 references.
12 Q. So driving their respective peripheral devices
13 is just interfacing with those hardware devices and
14 providing the functionality described in the references?
15 A. I wouldn't say "just."
16 Q. Anything else that should be included in that?
17 A. Based on what the references specifically
18 describe in those particular citations are what the
19 functionality is that I'm referring to.
20 Q. Is the '951 reply declaration still there?
21 A. All right. I've got it.
22 Q. If you go to the bottom of paragraph 7 for me,
23 it starts at the top of PDF page 10, your page 4.
24 A. "In my opinion"?
25 Q. Yeah, basically. I want the next sentence, but

1 it talks about Ono's intended purpose.
2 Do you see that?
3 A. Yes.
4 Q. How did you decide what Ono's intended purpose
5 was?
6 A. By looking at Ono.
7 Q. And what aspects of Ono did you look at to
8 identify the intended purpose?
9 A. The reference.
10 Q. Anything specific?
11 A. There's probably portions of Ono that are more
12 relevant to describing its intended purpose, but in
13 general, I looked at the entirety of the reference.
14 Q. And I didn't see it, but maybe you did
15 somewhere. Did you articulate what that intended
16 purpose of Ono is?
17 A. Let's see. This is going to go back to the
18 original declaration for the '951. I guess that was
19 Exhibit 1002. In Section 8, "Overview of the prior
20 art," there is a description of Ono that starts at
21 paragraph 70, page 47, of the document. There's also a
22 label at the bottom. It says page 48 of 184. And
23 there's a whole summary of Ono in paragraph 70 through
24 72. That's probably a good place to identify a general
25 description of Ono that would include its intended

1 purpose.
2 Q. I'm looking through those paragraphs. I don't
3 see you articulate what the intended purpose of Ono is.
4 Am I missing it somewhere?
5 A. Paragraph 70, "Ono is directed to," "Ono's
6 disclosed invention." It then goes on to describe its
7 operation. So I think those are what it's directed to,
8 "an image display apparatus that receives images
9 transferred from a plurality of information terminal
10 apparatuses connected to a wireless network. It
11 displays them on a display screen." That's what Ono is
12 at least, in part, trying to accomplish.
13 Q. Anywhere else that I should look in your
14 declaration for what your opinion is about Ono's
15 intended purpose?
16 A. There might be other paragraphs when I talk
17 about Ono specifically in the context of particular
18 limitations would be relevant in identifying not only
19 specific disclosures but general functionality. I -- I
20 can't say that those paragraphs are the only place that
21 describes its intended purpose. It's a good starting
22 point.
23 Q. Is there a difference in your mind between what
24 a reference's intended purpose is, what a reference is
25 directed to, or what a reference discloses?

1 A. There could be, but in the context of trying to
2 understand generally what a reference is -- is about,
3 what it's intended to do, I think at least at the level
4 of understanding what Ono is about, the portions that I
5 cited are -- are relevant to answering your question.
6 Q. Paragraph 8 for me of the '951 reply
7 declaration, here you're talking about what the petition
8 does towards the second half of this paragraph.
9 Do you see that?
10 A. I see that.
11 Q. Did you review the petition?
12 A. I think by at least this point I had reviewed
13 the petition.
14 Q. Do you know when you first reviewed the
15 petition?
16 A. I don't.
17 Q. You cite to the petition in this paper. You
18 don't cite -- you also, I think, cite to the Patent
19 Owner paper, the POR. There's a citation in the same
20 paragraph. I don't see any citations to Dr. Brogioli's
21 declaration. Did I miss those? Do you -- do you -- are
22 you familiar with any times that you cite to
23 Dr. Brogioli's declaration?
24 A. I -- I don't have the declaration memorized.
25 It would speak for itself. You can certainly search

1 through for the exhibit number or "Brogioli" and see
2 where I've either referenced his deposition or his
3 declaration. I think, in general, the parties have been
4 consistent in terms of the scope of the opinions that
5 have been offered between the declarations of the
6 experts and the petitions and the responses and briefs.
7 Q. Have you ever read the KSR obviousness case
8 from the Supreme Court?
9 A. I have.
10 Q. Have you ever read the In re Keller obviousness
11 case from the Federal Circuit?
12 A. That one doesn't ring a bell. I would have to
13 look at it and see. I might have at some point.
14 Q. As part of your work on this case, did you
15 refresh your memory on any of those cases?
16 A. I'd have to look and see what Keller was about.
17 At least the legal instructions that I would have been
18 provided and the understanding I would have had as set
19 forth in the opening declarations might be reflective of
20 Keller. It certainly, to my recollection, is reflective
21 of KSR.
22 Q. And so paragraph 10 of the '951 reply
23 declaration says, "Based on my expertise and
24 understanding of the relevant technology and law."
25 Do you see that?

1 A. I do.
2 Q. Is your understanding of the relevant law based
3 on anything that is not part of your opening
4 declaration?
5 MR. GREENLEAF: I'm going to object as vague.
6 THE WITNESS: Let me look. So the '951 opening
7 declaration doesn't have a legal section, per se, but I
8 think it generally describes what's -- what my
9 understanding is for the kinds of analysis that are
10 contained in the references that it's focused on the
11 kinds of opinions that are in the declaration.
12 BY MR. HALVERSON:
13 Q. And so in paragraph 10 of your '951 reply
14 declaration, you draw your conclusion based on your
15 expertise, your understanding of the relevant
16 technology, and your understanding of the relevant law,
17 and I'm trying to figure out how I can get an
18 understanding of what your understanding of the relevant
19 law is.
20 Is there something in your opening declaration
21 that articulates this?
22 A. I think the sum total of what's in the opening
23 declaration speaks for itself in terms of what my
24 understanding is and what I was specifically asked to do
25 with respect to whether or not the prior art disclosed

1 particular limitations and then whether or not a person
2 in the skill of the art would have been motivated to
3 consider the other references for the reasons that I --
4 that I identify. And so that includes things like
5 consideration of the state of the art, the definition of
6 a person of skill in the art as of the priority date of
7 the patents, the differences between the claims, and the
8 prior art, and then any consideration for secondary
9 considerations.
10 Q. Anything else?
11 A. Generally, the initial declaration, those are
12 the kinds of things that come to mind sitting here now.
13 Q. Do you have all of the exhibits from the
14 proceedings?
15 A. I should.
16 Q. Can you pull up Exhibit 2024?
17 A. I'm assuming for the '951?
18 Q. That's a great question. It was filed in the
19 '951.
20 A. Okay. I don't -- on this computer, I only have
21 the petition exhibits. I thought I had some of the POR
22 exhibits so you'll have to draw up that one in the chat.
23 Q. I can do that. Let's see.
24 All right. 2024 has been dropped in the chat.
25 Let me know when you've got it up.

1 A. Okay.
2 Q. So page 3 begins at table "Different USB class
3 codes"; right?
4 A. Give me a second to look. Okay. I see page 3.
5 Q. Do you see the USB class codes in the left-hand
6 column?
7 A. Yes.
8 Q. And so there's 25 of them here; right?
9 A. Yes.
10 Q. And some of them reference subclasses. So if
11 you look at -- on page 3, the third one down, you see
12 "Subclass O2h (ACM)"?
13 A. I see that.
14 Q. So the next couple of pages, there's a handful
15 of more subclasses; right?
16 A. Yes.
17 Q. Do these drivers operate in different ways?
18 A. Generally speaking, yes.
19 Q. If you go all the way down, the last one in the
20 list is vendor specific; right?
21 A. I see that.
22 Q. And so that would be dependent on whatever
23 vendor was providing that USB class driver; right?
24 A. Potentially.
25 Q. If you go back to -- there we go --

1 paragraph 22 of the '951 reply declaration for me,
2 please.
3 A. Okay.
4 Q. Paragraph 22, we're talking about Uchida, which
5 you're familiar with, Exhibit 1009; is that right?
6 A. Yes.
7 Q. And feel free to look at Uchida, if that's
8 easier, but my question is paragraph 22 says that moving
9 the switch to the "on" position stops image transfer.
10 Do you see that?
11 A. I see that.
12 Q. And from what device to what device is the
13 transfer stopped?
14 A. Could you repeat the question?
15 Q. From what device to what device is the transfer
16 stopped?
17 A. It looks like it says -- in paragraph 71, it
18 stops -- well, it provides instructions to the device
19 that it's on so that should be -- I forget the number.
20 I think it's one -- so that should cause the device --
21 the peripheral device in the language of the claims to
22 stop transmitting to -- I'd have to check what it sends
23 it to. So it should stop it from being transmitted over
24 the wireless network and then it's going to go to
25 whatever it's communicating with, what's identified as

1 the base node or -- you know, ultimately the base node
2 together with the projector is my recollection.
3 Q. So looking at Figure 2, I guess, and 2C, which
4 is the device all functioning -- the system all set up;
5 right?
6 A. I had referenced kind of Figures 1 and 3.
7 Q. One works. We can use one. So in Figure 1 the
8 system is all set up and there is a projector that is
9 displaying an image up on a screen; right?
10 A. There should be.
11 Q. And the "on" switch that you're referring to in
12 the paragraph of your declaration that we were just
13 talking about is on -- physically located on Component 1
14 of Figure 1; right?
15 A. It is.
16 Q. And so just so I understand, it's your
17 interpretation of paragraph 71 that that "on" switch
18 stops the transmission of data from device 1 to
19 projector 3; is that right?
20 A. That is correct. Right. But the -- the switch
21 is for stop. So when it's on, it's in stop mode.
22 Q. And when it's in stop mode, it's your opinion
23 that that ceases or prevents the image transfer from
24 Component 1 to Component 3?
25 A. To image projection device 3 as it's described

1 in paragraph 24. So it's the combination of the base
2 node and integrated in the first display.
3 Q. I'm sorry. When you said paragraph 24 there,
4 you're talking about 24 of Uchida?
5 A. No. 24 of the '951 declaration.
6 Q. Of your reply '951 declaration?
7 A. Yes.
8 Q. Dr. Almeroth, do you have any understanding of
9 whose burden it is to establish obviousness in an IPR?
10 A. The petitioner.
11 Q. And do you have an understanding of whose
12 burden it is to establish a reasonable expectation of
13 success of a combination that is proposed in an IPR
14 petition?
15 A. It should also be the petitioner.
16 Q. And what's required to establish a reasonable
17 expectation of success?
18 A. I don't have a general legal description for
19 you. From a technical perspective, that a person of
20 skill in the art would be able to implement the
21 combination without undue experimentation and there's a
22 variety of considerations as to what that might be,
23 including a level of disclosure in the references, the
24 knowledge of a person of skill in the art, the relative
25 technical level of the patents themselves. I think

1 there's a whole set of considerations that one could
2 consider in terms of whether or not a person of skill in
3 the art would have sufficient skill to implement the
4 combination without undue experimentation.
5 Q. Dr. Almeroth, pending anything else from
6 Mr. Greenleaf, that is it for me for today.
7 A. All right.
8 MR. GREENLEAF: I have a quick question.
9 EXAMINATION
10 BY MR. GREENLEAF:
11 Q. Dr. Almeroth, can you open up the Kaplan
12 reference, please, Exhibit 1027.
13 A. I'm going to do it electronically since it's
14 probably easier. I have it open.
15 Q. Would you please read paragraph 40.
16 A. Into the record?
17 Q. No. Just to yourself.
18 MR. HALVERSON: Oh, gosh no.
19 THE WITNESS: Thanks. Yes, I see it.
20 BY MR. GREENLEAF:
21 Q. Okay. Do you recall the question earlier today
22 about Kaplan and whether it required installation of
23 software?
24 A. Yes.
25 Q. Does this paragraph add anything additional to

1 that analysis?
2 A. Yes. It's another paragraph in Kaplan that I
3 think is relevant to the question and was part of
4 something I considered. It was just not a paragraph
5 that we got to as we started in on Kaplan.
6 Q. What in this paragraph is relevant in your
7 opinion?
8 A. Step 3, no complex software installation or
9 online setup. It's one of the benefits that's
10 identified there so it can -- it can exist without
11 software installation -- complex software installation
12 or setup.
13 MR. GREENLEAF: No further questions.
14 MR. HALVERSON: Nothing from me.
15 THE STENOGRAPHER: We are going off the record
16 at 10:57 a.m.
17 (Whereupon, proceedings were adjourned.)
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A

able
38:15, 59:20
about
7:19, 9:3, 9:11, 10:18, 12:3, 12:24, 12:25, 13:21, 14:17, 15:15, 15:16, 16:20, 16:23, 17:8, 18:13, 19:1, 19:18, 20:17, 23:7, 24:19, 25:14, 31:17, 32:12, 32:25, 35:7, 35:14, 35:16, 36:3, 38:19, 38:20, 39:24, 40:2, 40:5, 40:9, 40:12, 43:2, 46:5, 46:6, 46:8, 46:13, 46:15, 47:13, 47:14, 47:16, 47:25, 48:2, 48:15, 50:1, 51:14, 51:17, 52:2, 52:4, 52:7, 53:16, 57:4, 58:13, 59:4, 60:22
above
18:5
accomplish
51:12
accordingly
45:20
accounting
20:10
accurate
8:8
accurately
37:15
achieve
34:20, 47:24
achieving
32:4, 34:22, 47:4
acm
56:12
across
9:23, 16:16, 40:4
actual
12:25, 28:1
actually
12:11, 15:18, 17:20, 18:1, 36:7, 36:20, 36:21, 37:4, 38:2, 39:9, 39:11, 40:2, 42:11, 47:23
add
60:25
addition
19:9, 30:18
additional
12:12, 16:15, 34:25, 35:6, 36:8, 36:9, 36:13, 36:24, 39:14, 44:1, 44:6, 60:25
addressed
18:3
addressing
17:19
adjourned
61:17
adopted
23:17
afield
21:8
after
24:1, 29:10
again
16:7, 18:14, 18:24, 27:22, 40:10, 41:8, 43:20, 45:16, 48:14
agnostic
17:23
agree
15:2, 31:20
ahead
21:14, 24:8, 26:16, 33:19, 33:20
ahmed
37:4
aides
18:15
al
6:7
aligned
32:21
all
7:14, 7:17, 7:24, 8:1, 8:10, 8:11, 8:23, 11:3, 11:7, 14:9, 14:22, 15:3, 16:16, 16:17, 17:14, 17:16, 22:13, 29:25, 32:21, 38:7, 38:12, 38:18, 40:4, 47:4, 47:21, 49:21, 55:13, 55:24, 56:19, 58:4, 58:8, 60:7
alleged
30:9, 30:13
allow
39:13
allowed
25:6, 32:13
allows
8:1, 33:23, 37:5, 38:21
almeroth
1:20, 2:19, 4:4, 6:14, 6:20, 6:23, 7:4, 9:19, 14:16, 28:6, 42:23, 59:8, 60:5, 60:11
alone
26:6
already
13:18, 17:25, 18:3, 27:3, 32:18, 35:3, 46:12, 46:15, 47:16
also
10:4, 10:12, 15:19, 15:24, 20:7, 21:18, 29:19, 32:7, 34:10, 50:21, 52:18, 59:15
alter
44:5
altered
19:11
alternative
19:2, 34:21, 37:11
alternatives
34:12, 46:18
although
10:17, 32:18
amend
29:5
amendments
28:18, 29:5, 29:8, 29:10
amounts
7:13
analyses
43:9
analysis
12:20, 13:2, 15:4, 37:7, 48:5, 54:9, 61:1
analyzing
44:3
andrew
14:10
another
8:17, 8:24, 45:13, 61:2
answer
5:9, 8:22, 12:3, 13:16, 23:11, 29:19,

38:16
answering
52:5
answers
26:10
antithetical
26:7, 34:17
any
7:9, 7:15, 8:7, 9:24, 10:9, 10:21, 10:23, 12:9, 12:12, 12:16, 12:19, 12:24, 13:1, 13:6, 13:8, 13:9, 13:14, 13:21, 14:14, 14:16, 19:8, 20:9, 22:6, 24:4, 24:11, 24:16, 29:8, 30:21, 35:22, 36:2, 36:11, 36:15, 38:23, 52:20, 52:22, 53:15, 55:8, 59:8, 62:17, 62:19
anything
9:9, 14:7, 19:8, 49:16, 50:10, 54:3, 55:10, 60:5, 60:25
anywhere
18:21, 51:13
apparatus
51:8
apparatuses
51:10
appeal
1:2, 2:2
applicant
30:3
applicant's
27:25
applicants
28:10
application
15:22, 28:7, 29:17, 30:14
applications
35:21
applied
23:16, 25:24, 35:10, 37:16
applies
11:3
apply
7:8, 10:23, 11:7, 26:4, 43:22
applying
32:8
area
15:25
aren't
11:5, 24:25, 35:2, 36:16
argument
34:14, 43:4
arguments
28:18, 36:1, 45:17
around
41:22
arrive
32:13
arrived
41:17
art
18:1, 18:3, 18:4, 20:4, 20:11, 20:22, 21:6, 21:9, 23:16, 25:13, 25:25, 26:4, 27:5, 27:16, 27:23, 28:16, 29:17, 30:8, 30:17, 30:20, 32:8, 33:16, 34:7, 34:11, 35:10, 37:12, 37:22, 37:25, 43:5, 43:10, 43:15, 43:20, 44:4, 44:12, 46:20, 46:23, 48:13, 48:23, 50:20, 54:25, 55:2, 55:5, 55:6, 55:8, 59:20, 59:24, 60:3
articulate
15:7, 36:4, 50:15, 51:3
articulated
18:9, 18:11
articulates
54:21
articulation
27:25
asked
16:6, 39:12, 40:2, 45:3, 46:5, 46:13, 47:25, 54:24
asking
38:19, 47:13, 47:14
aspect
26:25, 27:9, 30:22, 47:22
aspects
46:14, 48:8, 50:7
associated
38:7, 38:12
assuming
55:17
attach
13:5
attempt
43:19, 48:10
attempted
15:7, 18:20
attempting
17:22, 18:2, 45:2
attempts
43:4
audio
41:3
auto
15:20
automatic
34:20, 34:22
automatically
33:4, 33:15, 34:6, 47:3, 48:21
available
8:12, 27:4, 34:10
average
22:10
aware
10:9, 10:21, 10:23, 19:23, 22:6
away
44:20, 45:1, 45:4, 45:6

B

b
19:15
back
10:5, 28:17, 29:22, 30:1, 35:13, 40:1, 42:21, 50:17, 56:25
background
15:11, 15:12, 15:25, 18:12
barco
1:12, 2:12, 6:7, 6:17, 12:24, 12:25, 16:8, 17:21, 18:2, 18:20, 24:1, 24:18, 25:16, 25:22, 36:6, 36:19, 37:9, 38:5, 38:7, 38:10, 39:6, 39:8, 45:17
barco's
11:13, 14:19,

25:8, 25:15, 36:5, 36:23
base 22:6, 22:10, 58:1, 59:1
based 24:19, 40:25, 41:4, 49:17, 53:23, 54:2, 54:14
basically 46:12, 49:25
basis 37:16, 39:7, 39:18, 48:9
beautiful 7:11
because 25:18, 27:6, 27:19, 33:21, 34:16, 39:6, 41:21
become 20:9
been 6:24, 7:18, 7:25, 18:17, 22:18, 36:10, 37:11, 39:19, 41:25, 42:16, 53:3, 53:5, 53:17, 55:2, 55:24
before 1:2, 2:2, 2:22, 7:8, 9:11, 28:21, 29:8, 41:25, 42:6, 43:3, 46:5
beginning 2:20, 12:2
begins 19:2, 56:2
behalf 2:20, 6:17
being 7:16, 14:21, 16:6, 17:22, 20:6, 23:15, 26:10, 26:11, 34:2, 34:12, 36:7, 36:19, 37:16, 57:23, 62:9
believe 9:10, 12:7, 12:22, 14:18, 14:25, 24:18, 24:22, 41:21, 44:10, 48:13
bell 22:5, 53:12
benefits 33:8, 61:9
between 26:12, 26:21, 28:3, 47:17, 51:23, 53:5, 55:7
beyond 13:18, 32:11, 34:21, 36:14, 36:24, 43:11
bit 13:16, 36:12
board 1:2, 2:2, 62:21
boilerplate 34:24
borge 1:30, 2:23, 6:11, 62:7, 62:27
borrow 17:6
both 16:23, 40:17
bottom 49:22, 50:22
bounds 17:8
boxes 40:19, 42:8
break 42:17, 43:3
brief 12:11
briefs 53:6
broad 23:14, 36:25
brogioli 12:4, 12:7, 12:17, 16:9, 17:21, 24:18, 25:5, 25:18, 25:21, 34:14, 36:6, 36:19, 36:25, 37:9, 39:6, 39:9, 39:22, 45:17, 53:1
brogioli's 11:9, 13:9, 39:16, 52:20, 52:23
broke 41:8
bunch 18:19
burden 12:10, 59:9, 59:12
business 18:18

C

california 2:23, 3:18, 6:11, 62:3, 62:21
came 18:5, 44:23
can't 8:7, 51:20
case 1:10, 2:10, 6:7, 53:7, 53:11, 53:14
cases 53:15
cause 57:20
cd 42:8, 42:11, 42:13
ceases 58:23
center 3:16
certain 38:21
certainly 13:16, 16:14, 17:9, 20:7, 21:4, 30:15, 32:6, 52:25, 53:20
certificate 62:1, 62:28
certification 6:13
certified 2:23, 6:12, 6:24, 62:1, 62:7
certify 62:8, 62:19
change 9:10, 24:16
changed 35:22
changes 35:8
characteristics 25:1
characterization 30:7, 31:21
characterizations 24:24
characterized 25:23, 36:7, 36:19
characterizing 25:19, 25:21, 29:19, 37:14
chat 55:22, 55:24
check 13:25, 14:4, 22:21, 40:1, 57:22
checked 15:13

choose
24:12
circle
21:3, 29:22
circuit
53:11
citation
14:13, 52:19
citations
49:18, 52:20
cite
52:17, 52:18, 52:22
cited
52:5
claim
17:7, 24:25, 27:17, 28:13, 38:14
claims
27:15, 28:25, 29:1, 29:13, 29:15, 29:20, 29:24, 30:2, 30:18, 38:18, 55:7, 57:21
clar
26:18
class
20:18, 21:17, 21:18, 21:23, 21:25, 22:3, 22:7, 22:10, 23:2, 56:2, 56:5, 56:23
classes
20:1, 20:2, 20:18, 20:25, 21:11, 21:12
clause
30:7, 47:7, 47:9
clear
32:22, 35:3, 36:10
clear-cut
26:1
clearly
36:4
clicked
24:5
clickshare
24:2, 38:8, 38:12, 41:6, 41:9
close
42:3, 42:4
code
22:3
codes
21:23, 21:25, 23:2, 56:5
codes"
56:3
column
15:16, 15:19, 15:23, 18:13, 19:1, 56:6
com
3:10, 3:20
combinability
24:19, 27:10
combination
59:1, 59:13, 59:21, 60:4
combine
11:23, 26:6, 27:2, 27:5, 34:15, 37:3, 37:18, 39:19, 44:12, 44:17, 45:9, 45:11, 48:5, 48:12
combined
25:11, 25:17, 39:8, 44:9, 45:19
combining
44:25
come
15:8, 19:25, 21:16, 21:20, 34:11, 46:24, 55:12
comes
9:14, 18:13, 28:17, 32:9, 34:7, 39:10, 44:14, 44:18, 45:13, 46:17
common
19:24
communicated
20:13
communicating
20:3, 20:5, 57:25
communication
34:9
compared
22:17, 27:9, 28:4
complex
61:8, 61:11
component
58:13, 58:24
computer
19:4, 19:5, 33:3, 42:14, 55:20
concept
31:18, 31:24, 32:7, 44:19, 47:19
concepts
26:9, 26:13, 26:21
concern
16:24, 37:5
concerns
7:9
concludes
49:3
conclusion
10:7, 10:16, 10:17, 12:17, 18:14, 32:14, 46:24, 54:14
conclusions
10:24
conducting
18:17
configuration
15:21, 25:4
confine
43:4
confirm
23:25
connected
24:2, 51:10
connecting
17:13
cons
20:24
consider
20:23, 24:22, 27:10, 30:10, 33:17, 37:10, 43:14, 55:3, 60:2
consideration
55:5, 55:8
considerations
10:9, 10:18, 10:22, 11:4, 11:6, 11:21, 11:25, 12:10, 55:9, 59:22, 60:1
considered
30:15, 45:4, 61:4
considering
30:9, 43:25, 44:17
consistent
53:4
construction
17:7
contained
54:10
content
13:22, 19:4, 19:9
contents
43:17
context
13:19, 16:11, 18:18, 20:17, 20:20, 22:18, 23:12, 23:16, 26:2, 33:10, 33:22, 34:2, 34:13, 34:18,

35:4, 38:15, 39:2, 45:22, 46:17, 48:17, 51:17, 52:1
continues 18:25
conversation 47:12
convey 41:2
copies 10:4
corners 30:15
correct 11:3, 12:5, 14:14, 14:15, 14:22, 14:25, 22:3, 36:2, 45:1, 58:20
corresponding 49:10
could 7:19, 10:1, 14:3, 20:12, 23:4, 23:14, 24:11, 26:20, 27:3, 28:20, 29:11, 30:12, 30:14, 33:14, 35:8, 35:10, 36:21, 42:23, 43:22, 43:25, 46:19, 46:24, 46:25, 48:24, 52:1, 57:14, 60:1
counsel 6:15, 62:16
county 62:5
couple 9:12, 21:19, 34:3, 42:5, 56:14
course 43:24, 44:3
court 7:12, 53:8, 62:21
cover 9:18, 23:14
create 7:12, 48:10
creates 26:3
creativity 32:9, 43:15, 43:23
crestron 12:19, 13:13, 13:17, 13:22, 13:24, 14:1, 14:5
crestron's 14:17
csr 1:31, 62:7, 62:27
curious 46:8
current 45:5
customized 21:6

D

d: 42:8
data 20:3, 20:6, 20:12, 21:1, 58:18
date 23:18, 30:9, 30:10, 42:3, 42:5, 55:6
dated 62:24
dates 22:17, 22:19, 41:16, 41:17, 41:23, 41:24
days 42:6
dc 3:8
deal 17:22
dealt 12:11
dec 22:22
december 1:22, 2:22, 6:1, 6:5, 62:24
decide 50:4
declaration 9:14, 10:2, 10:7, 10:12, 10:16, 11:2, 11:18, 12:6, 13:7, 13:10, 16:5, 16:11, 16:12, 16:13, 16:14, 16:16, 16:21, 19:15, 20:22, 21:16, 22:23, 23:21, 31:6, 31:7, 35:12, 35:13, 38:19, 39:6, 42:3, 42:24, 45:21, 48:7, 48:25, 49:20, 50:18, 51:14, 52:7, 52:21, 52:23, 52:24, 53:3, 53:23, 54:4, 54:7, 54:11, 54:14, 54:20, 54:23, 55:11, 57:1, 58:12, 59:5, 59:6
declarations 7:17, 7:18, 7:19, 8:11, 9:6, 9:20, 11:8, 11:10, 12:16, 12:21, 13:3, 13:15, 13:19, 13:21, 14:2, 14:8, 14:14, 14:20, 16:17, 21:20, 21:21, 22:22, 23:12, 39:3, 40:1, 40:4, 40:9, 48:23, 53:5, 53:19
define 39:14
defined 20:19, 23:1, 25:23
defining 39:11
definition 25:4, 26:1, 55:5
definitions 15:19
deforche 24:23, 37:4
dentons 3:5
dependent 56:22
depending 10:5
depictions 13:10
deponent 6:14
depos 6:13
deposition 1:19, 2:19, 6:9, 14:10, 16:18, 53:2
depositions 40:3
describe 12:6, 25:9, 34:21, 45:22, 47:16, 49:18, 51:6
described 16:18, 17:10, 32:1, 33:11, 34:2, 34:13,

35:4, 36:15, 46:12, 47:2, 48:10, 49:10, 49:14, 58:25
describes 16:19, 26:23, 48:16, 51:21, 54:8
describing 11:12, 29:12, 33:12, 34:4, 34:5, 48:3, 50:12
description 5:2, 27:20, 50:20, 50:25, 59:18
descriptions 12:25, 35:6
design 21:6
despite 18:15
detail 22:11
details 44:6
determine 46:10
determined 11:21
device 17:13, 20:13, 20:14, 20:18, 20:25, 21:17, 21:18, 22:4, 22:7, 57:12, 57:15, 57:18, 57:20, 57:21, 58:4, 58:18, 58:25
devices 16:25, 17:4, 17:5, 17:9, 17:12, 20:1, 49:4, 49:12, 49:13
difference 26:12, 26:15, 26:21, 47:17, 51:23
differences 55:7
different 9:23, 19:25, 20:25, 21:1, 25:5, 26:2, 26:9, 29:1, 29:9, 31:22, 46:18, 48:6, 48:8, 48:16, 56:2, 56:17
directed 51:5, 51:7, 51:25
direction 21:8, 62:15
directory 40:23
disagree 11:17, 13:9, 24:24
disagreed 45:19
disagreement 37:8
disclosed 35:1, 51:6, 54:25
discloses 32:10, 37:11, 43:13, 51:25
disclosure 30:23, 31:14, 32:11, 33:25, 43:11, 44:24, 46:9, 46:11, 47:18, 47:20, 59:23
disclosures 30:11, 43:5, 43:18, 43:21, 48:14, 51:19
discovery 17:13
discussing 27:12
discussion 15:17, 16:5, 16:15
disk 42:11
display 19:4, 51:8, 51:11, 59:2
displaying 58:9
displays 51:11
disputed 16:9
distinction 28:3
distinctive 48:8
distinguish 27:7
distinguishing 26:25, 37:24
dive 9:11
dlls 40:25
document 30:16, 50:21
doing 29:25, 30:5, 41:5
done 7:7, 14:3, 33:19
dongle 13:5, 24:2, 41:6, 41:9, 42:15
down 56:11, 56:19
dozen 20:2, 20:12, 20:15, 21:2, 21:12
dr 6:20, 7:4, 9:19, 11:9, 12:4, 12:7, 12:17, 13:9, 14:16, 16:9, 17:21, 24:18, 25:5, 25:18, 25:19, 25:21, 28:6, 34:14, 36:6, 36:19, 36:25, 37:9, 39:6, 39:9, 39:16, 39:22, 42:23, 45:17, 52:20, 52:23, 59:8, 60:5, 60:11
draw 28:3, 54:14, 55:22
drive 42:8, 42:11, 42:13, 49:3, 49:7
driver 40:23, 40:24, 41:1, 56:23
drivers 20:25, 24:23, 32:6, 34:8, 36:21, 36:24, 37:10, 40:14, 40:15, 40:17, 40:22, 40:24, 41:2, 41:24, 46:25, 49:3, 49:7, 49:8, 56:17
driving 49:12
dropped 55:24
duly 62:10
duties 62:20

E

earlier 22:16, 60:21
ease 7:11, 17:22,

18:25, 19:6, 33:6, 33:12, 34:1, 34:4, 34:10, 48:15, 48:17, 48:19
easier 57:8, 60:14
easy 47:5, 47:24
eight 16:17, 40:9
either 28:18, 43:24, 44:5, 53:2
electronic 18:15
electronically 60:13
else 18:21, 30:18, 49:16, 51:13, 55:10, 60:5
embarcadero 3:16
embodiment 32:1, 33:22
embodiments 33:2, 33:4, 33:10, 33:14, 34:5, 35:1, 35:2, 38:2, 38:4, 46:18, 47:3, 47:4, 47:22, 48:3, 48:6, 48:8, 48:12
enables 33:7
end 28:24, 49:2
endeavor 15:3, 15:6, 16:2, 17:3, 17:6, 17:8, 17:15
enhance 44:5
enjoy 33:8
entirety 50:13
eric 6:16
erik 3:15, 3:20
especially 17:10
esq 3:6, 3:15
establish 11:20, 12:10, 15:24, 59:9, 59:12, 59:16
established 12:4, 12:7
et 6:7
even 25:3, 26:4, 36:14, 37:13
ever 28:6, 31:3, 39:1, 44:8, 53:7, 53:10
everybody 7:11
everything 40:11
evidence 10:9, 10:21, 11:4, 11:25, 36:11, 36:15
exact 46:13
exactly 16:4, 29:24, 47:10
examination 7:2, 60:9
examinations 4:6
examined 6:25, 62:9
example 19:5, 33:1, 33:9, 36:24, 44:22, 45:13, 48:3
examples 34:18
excessive 7:13
excuse 31:6
exhibit 5:2, 7:16, 7:18, 8:3, 13:24, 14:6, 22:21, 30:23, 50:19, 53:1, 55:16, 57:5, 60:12
exhibits 7:24, 22:23, 55:13, 55:21, 55:22
exist 23:9, 61:10
existed 17:24
existence 11:22, 35:1
existing 27:8
exists 34:9
expectation 59:12, 59:17
experimentation 59:21, 60:4
expertise 53:23, 54:15
experts 53:6
explain 45:3
explanation 26:18
explicit 43:5
explorer 41:14
expressly 10:8
extends 15:16
extent 12:1, 21:7
extracting 19:4

F

facilitate 34:9, 48:19
fact 18:17, 24:13, 25:25, 26:22, 27:1, 32:7, 35:20, 36:12
factors 18:19, 18:20
fair 39:25
fairly 21:8, 23:14, 36:25
familiar 13:17, 21:23, 21:25, 22:8, 28:9, 44:19, 52:22, 57:5
far 8:3, 12:15, 21:8
feature 17:10, 37:24
featured 39:7
features 17:25, 27:8, 39:5
federal 53:11
feel 57:7
field 15:3, 15:6, 16:1, 16:7, 17:3, 17:6, 17:8, 17:15
figure 30:25, 40:19, 41:13, 54:17, 58:3, 58:7,

58:14
figures
40:16, 58:6
figuring
30:19
file
28:13, 41:4, 41:14
filed
28:6, 29:1, 55:18
files
12:24, 13:6, 24:1, 24:3, 24:6, 24:12, 24:14, 24:21, 36:8, 36:9, 36:13, 36:14, 36:16, 36:24, 37:6, 40:13
find
14:13, 21:22
fine
33:20
finite
19:18, 23:10
firm
6:12
first
6:24, 17:1, 33:2, 40:3, 40:18, 43:13, 45:3, 49:2, 49:3, 52:14, 59:2
flexibility
35:9
focal
38:18
focused
45:16, 54:10
folder
32:19
follows
6:25
footage
33:9
footprint
25:4, 25:19, 25:21, 26:2, 36:7, 36:20, 36:22, 37:1, 37:5, 37:14, 38:6, 38:11, 38:20, 39:2, 39:13, 39:22, 39:25, 40:12
foregoing
62:10
foresight
7:25
forget
57:19
formal
13:8
formally
16:6, 16:19
formats
9:23
forth
10:5, 22:15, 35:12, 37:13, 48:23, 53:19
found
9:12
foundational
47:22
four
7:14, 8:11, 11:3, 11:8, 12:16, 12:21, 13:3, 13:14, 13:19, 13:21, 14:2, 14:8, 14:14, 15:1, 15:2, 16:2, 17:16, 20:2, 21:11, 30:15, 43:8, 43:9
frame
23:19
francisco
3:18
free
57:7
freeze
8:20
front
21:13
froze
24:9, 38:9
function
48:15
functionalities
44:2
functionality
41:1, 49:10, 49:14, 49:19, 51:19
functioning
58:4
functions
17:14
fundamental
18:16
further
13:8, 61:13, 62:19

G

gates
3:14, 6:16
gathering
30:2
gave
24:5, 44:22
general
44:3, 50:13, 50:24, 51:19, 53:3, 59:18
generally
15:5, 16:16, 28:11, 30:6, 30:21, 34:4, 44:14, 52:2, 54:8, 55:11, 56:18
generic
24:23, 37:10, 46:25
give
8:7, 22:24, 31:8, 38:14, 38:15, 56:4
given
23:15, 37:5, 37:23, 38:1
go
10:2, 10:15, 16:21, 16:22, 19:14, 21:14, 23:20, 24:7, 24:8, 26:16, 31:9, 32:16, 33:19, 33:20, 35:13, 40:1, 42:23, 48:24, 49:22, 50:17, 56:19, 56:25, 57:24
goal
26:11, 27:6, 34:22, 48:19
goals
26:7, 34:17, 37:23
goes
15:22, 18:19, 19:5, 27:1, 33:5, 36:5, 37:20, 51:6
going
6:4, 7:13, 15:12, 22:21, 24:10, 26:17, 32:16, 33:21, 42:16, 46:14, 47:1, 50:17, 54:5, 57:24, 60:13, 61:15
good
6:4, 7:4, 17:20, 27:15, 33:1, 42:18, 50:24, 51:21
gosh
60:18
great
7:6, 55:18
greenleaf
3:6, 4:9, 6:18, 42:19, 54:5, 60:6, 60:8, 60:10, 60:20,

61:13
greenleaf@dentons
3:10
ground
7:8
grounds
14:22, 14:24
guess
12:2, 49:2, 50:18, 58:3
guidance
44:1

H

half
20:2, 21:12, 52:8
halverson
3:15, 4:8, 6:16, 7:3, 42:16, 42:22, 54:12, 60:18, 61:14
halverson@klgates
3:20
hand
6:21
handful
7:7, 56:14
handle
29:23
handling
18:16
happen
28:20, 28:22, 29:3, 29:4
happened
29:9, 29:10
hard
41:4
harder
13:16
hardware
49:9, 49:13
heading
18:5
hear
7:7, 8:22, 38:9, 38:22
heard
17:20
heavily
39:5
help
15:24
helpful
23:5
here
8:21, 10:17, 12:23, 13:20, 16:23, 20:21, 22:19, 24:17, 33:11, 34:2, 40:7, 41:11, 45:15, 48:18, 52:7, 55:12, 56:8
hereby
62:8
hereunto
62:22
history
28:21
hold
22:20
hot
15:21
hour
42:17
however
42:14
human
21:17, 22:4
hundreds
40:10
hypothetical
36:13

I

idea
11:5, 24:20, 27:4, 33:12, 34:1, 34:4, 35:7, 37:2, 37:13, 37:20, 44:14, 46:16, 46:21, 47:21
identified
19:19, 19:22, 20:21, 23:9, 57:25, 61:10
identifies
22:23
identify
7:20, 13:20, 16:7, 50:8, 50:24, 55:4
identifying
51:18
image
51:8, 57:9, 58:9, 58:23, 58:25
images
51:8
impact
36:2
implement
31:14, 32:2, 43:19, 44:2, 46:7, 47:8, 47:13, 47:19, 48:1, 59:20, 60:3
implemented
43:25, 46:19
implementing
43:24, 44:7, 48:17
important
27:7, 27:10
improve
37:23
incarnation
45:5
include
13:8, 50:25
included
49:16
includes
19:1, 55:4
including
7:12, 35:24, 47:3, 59:23
incompatibility
45:12
inconsistent
24:22, 25:7, 25:8, 25:22, 25:24, 39:16
inconsistently
39:10
incorrect
9:10
incorrectly
37:13
indicative
27:17
informally
16:19
information
5:5, 13:1, 22:13, 41:3, 51:9
initial
48:7, 55:11
initiated
39:23
inner
21:3
install
13:5, 24:12, 24:14, 31:13, 31:18, 32:13, 34:5, 34:19, 36:7, 36:24, 41:24, 42:2, 45:22, 46:17, 46:21, 47:2
installation
32:5, 32:15, 33:6, 33:12, 33:21, 34:20, 34:22, 37:6, 38:21, 38:23, 38:24, 38:25, 39:13, 41:7, 41:10, 42:1, 60:22, 61:8, 61:11
installed
24:1, 24:3,

25:6, 33:3, 33:4, 33:14, 33:15, 35:21, 36:14, 36:16, 36:22, 47:3, 48:21
installing 24:6, 24:21, 31:24, 37:21, 38:3, 38:4
installs 27:1
instead 15:1, 48:20
instructed 5:9
instructions 53:17, 57:18
integrated 59:2
intended 50:1, 50:4, 50:8, 50:12, 50:15, 50:25, 51:3, 51:15, 51:21, 51:24, 52:3
interested 62:17
interesting 24:17
interface 19:3, 21:17, 22:4, 49:8
interfaces 15:20
interfacing 49:13
interpretation 43:10, 58:17
interrupt 24:8, 26:16, 33:18
introduce 6:15
introduced 39:9
invalidity 25:2, 48:9
invention 24:21, 25:1, 26:10, 26:24, 27:10, 27:13, 27:18, 27:20, 27:25, 28:1, 28:3, 28:5, 29:7, 29:9, 29:13, 29:18, 30:3, 30:13, 30:19, 30:22, 31:1, 31:2, 31:5, 31:19, 31:25, 32:4, 37:22, 38:1, 47:23, 48:9, 51:6
inventor 28:5
involved 7:11, 28:8, 38:4
involves 18:18
ipr 1:11, 1:12, 1:13, 1:14, 2:11, 2:12, 2:13, 2:14, 6:8, 8:14, 8:17, 8:24, 9:3, 9:15, 15:2, 59:9, 59:13
issue 15:1, 16:2, 16:17, 17:17, 24:18, 26:3, 28:25, 39:15
issued 27:17, 29:9
issues 7:9
itself 52:25, 54:23

J

job 1:33
jump 10:5
june 41:25

K

k&l 3:14, 6:16
kaplan 20:21, 21:10, 24:20, 26:22, 27:6, 27:13, 31:19, 31:25, 32:5, 32:14, 32:17, 32:23, 33:17, 33:22, 33:24, 34:2, 34:4, 34:13, 34:17, 34:19, 34:21, 35:11, 37:4, 37:11, 37:23, 37:24, 37:25, 38:2, 45:22, 46:14, 46:19, 47:6, 48:2, 48:4, 48:6, 48:9, 48:14, 48:15, 48:16, 60:11, 60:22, 61:2, 61:5
kaplan's 27:7, 31:12, 31:15, 31:17, 32:3, 32:12, 46:7, 46:23, 48:19
keller 53:10, 53:16, 53:20
kevin 1:20, 2:19, 3:6, 3:10, 4:4, 6:14, 6:18, 6:23
key 20:12
kind 15:24, 20:5, 20:16, 21:3, 25:10, 37:6, 58:6
kinds 17:14, 17:24, 17:25, 19:24, 21:1, 21:4, 33:16, 34:8, 39:20, 49:10, 54:9, 54:11, 55:12
know 10:3, 12:15, 14:3, 15:7, 15:8, 17:6, 19:15, 21:4, 22:9, 24:10, 34:1, 35:14, 38:17, 41:6, 41:9, 41:20, 42:13, 52:14, 55:25, 58:1
knowledge 32:8, 43:23, 44:7, 59:24
ksr 53:7, 53:21

L

label 37:15, 50:22
labeled 7:25
lack 24:19
language 57:21
large 18:18
last 9:2, 26:9, 30:7, 56:19
law 53:24, 54:2, 54:16, 54:19
least 7:17, 14:1, 14:7, 15:12,

16:11, 16:19, 17:12, 17:16, 20:3, 20:23, 21:15, 23:12, 30:1, 35:12, 51:12, 52:3, 52:12, 53:17
led
12:20, 41:10
left-hand
56:5
legal
53:17, 54:7, 59:18
legs
42:17
less
20:9
let's
19:14, 29:22, 32:16, 35:5, 40:18, 42:17, 50:17, 55:23
level
11:20, 20:11, 44:23, 52:3, 59:23, 59:25
likely
16:19, 20:20
limitations
51:18, 55:1
limited
20:8
limiting
46:11, 46:22
line
5:6, 5:11, 15:16, 18:13, 19:1, 37:7, 43:2
list
18:19, 22:2, 22:23, 56:20
listed
19:6
little
42:16
llp
3:5
located
58:13
look
13:23, 21:14, 22:22, 22:25, 23:4, 23:5, 27:14, 27:15, 29:13, 29:14, 29:16, 29:23, 30:8, 30:12, 30:17, 30:19, 30:24, 34:23, 34:25, 40:25, 41:23, 43:13, 50:7, 51:13, 53:13, 53:16, 54:6, 56:4, 56:11, 57:7
looked
18:21, 31:3, 34:3, 50:13
looking
15:10, 29:20, 29:24, 30:2, 30:5, 32:9, 50:6, 51:2, 58:3
looks
57:17
lost
46:4
love
7:7, 26:20
ludke
14:10

M

m-a-r-d-i-k-s
16:10
ma'am
7:1
machine
8:12, 41:17
made
28:18, 35:8, 45:17, 62:20
main
20:4, 20:5
make
11:16, 12:14
making
19:3, 24:18, 34:15, 36:1
mandated
62:21
manner
8:1
manufactured
25:11
many
19:22, 22:9, 23:8, 38:17, 40:16
mardiks
16:9, 16:23, 18:6
marked
7:18
marking
14:17, 14:19
mass
21:18
matter
6:6
matters
8:23
maturity
23:15
maybe
20:12, 50:14
mean
16:13, 24:8, 24:17, 26:15, 33:18, 38:23, 40:9, 46:8, 47:10, 49:7
means
26:2, 27:2, 27:7, 29:25, 36:23, 37:1, 37:2, 39:25, 47:15
meetings
18:16, 18:18
memorized
22:2, 40:11, 52:24
memory
53:15
mentioned
21:15, 21:19
mentions
15:19
metes
17:7
method
19:2
mid-'s
23:19
middle
41:22
might
16:15, 34:25, 40:2, 44:4, 51:16, 53:13, 53:19, 59:22
mind
9:14, 18:13, 21:17, 21:21, 21:22, 22:1, 22:12, 23:3, 26:13, 34:11, 44:15, 44:18, 44:23, 45:2, 45:13, 45:14, 51:23, 55:12
misapplication
39:17
miss
11:16, 12:14, 52:21
missing
51:4
mo
48:7
mode
58:21, 58:22
modification
41:16
modifications
34:24, 35:7
monday
1:22, 2:21, 6:1, 6:5
more
7:16, 12:11, 13:4, 19:14,

20:20, 33:8, 40:5, 50:11, 56:15
morning 6:4, 7:4, 7:5, 8:8
most 19:24, 41:12
motivated 44:4, 55:2
motivation 11:23, 34:15, 35:3, 35:11, 37:3, 37:18, 39:19
motivations 48:5
mounted 42:15
moved 21:7
moving 21:2, 57:8
multiple 20:16, 29:4, 29:5, 40:16

N

name 6:11, 8:3, 28:7, 62:23
names 40:25, 41:4
necessary 21:7, 35:2, 48:13
need 9:10, 12:12
needed 34:8, 48:11
needing 7:12
neither 62:16
network 1:4, 1:5, 2:4, 2:5, 6:6, 51:10, 57:24
next 36:18, 41:23, 49:25, 56:14
nexus 11:20, 12:4, 12:8, 12:17
node 58:1, 59:2
non-limiting 46:8, 47:7, 47:14, 47:18, 47:20
none 5:3, 5:7, 5:13
nonlimiting 31:13, 45:23
nothing 32:4, 61:14, 62:11
notice 2:24
novelty 32:2
number 6:13, 7:20, 7:21, 8:3, 9:15, 14:7, 18:18, 19:18, 23:1, 23:3, 23:10, 53:1, 57:19
numbers 1:10, 2:10, 6:7, 8:1, 22:21
nw 3:7

O

o2h 56:12
object 54:5
objective 33:13, 34:16, 44:15, 44:24, 45:8, 47:5, 47:24
obtained 28:10
obvious 21:3, 32:11, 37:9, 37:12, 48:22
obviousness 11:7, 14:24, 15:4, 43:8, 48:4, 53:7, 53:10, 59:9
october 41:22, 42:4
offer 11:1, 12:12, 16:1
offered 11:7, 12:1, 13:7, 17:23, 48:2, 53:5
offering 14:16, 39:24
office 1:1, 2:1, 28:14, 28:16, 28:25
oftentimes 28:25
oh 38:10, 60:18
okay 8:22, 10:5, 10:14, 31:11, 32:20, 35:19, 36:18, 42:25, 49:1, 55:20, 56:1, 56:4, 57:3, 60:21
once 7:16
one 7:13, 8:14, 8:17, 8:24, 9:2, 9:13, 10:14, 15:8, 16:7, 18:12, 19:5, 19:14, 22:16, 22:18, 22:22, 26:10, 26:11, 30:12, 37:15, 40:18, 41:12, 44:14, 44:18, 45:10, 48:18, 53:12, 55:22, 56:11, 56:19, 57:20, 58:7, 60:1, 61:9
ones 20:4, 20:19, 20:23, 21:15, 21:19, 21:20, 21:22, 22:17, 36:10, 40:22, 40:23
online 22:13, 61:9
only 7:14, 9:13, 13:23, 29:19, 34:3, 38:3, 51:18, 51:20, 55:20
ono 50:6, 50:7, 50:11, 50:16, 50:20, 50:23, 50:25, 51:3, 51:5, 51:11, 51:17, 52:4
ono's 50:1, 50:4, 51:5, 51:14
open 10:1, 10:6, 10:12, 60:11, 60:14
opening 16:13, 16:16, 35:12, 53:19, 54:3, 54:6, 54:20, 54:22
operate 56:17
operates 26:24
operation 17:11, 17:13, 25:15, 27:8,

51:7
opined
44:8
opining
11:24, 14:23, 36:3
opinion
11:1, 16:1, 17:24, 31:12, 31:22, 35:2, 38:5, 38:10, 39:24, 43:3, 47:9, 49:24, 51:14, 58:22, 61:7
opinions
9:21, 11:7, 11:20, 12:13, 13:6, 13:7, 13:21, 14:1, 14:2, 14:17, 24:15, 24:17, 35:22, 39:20, 48:2, 53:4, 54:11
opposed
47:1
option
24:5
optional
36:11, 36:12
options
23:13, 24:4, 24:11
ordinary
32:8, 43:14, 43:23, 44:12, 48:22
org
22:14
organizing
18:17
original
39:2, 50:18
originally
29:1
other
7:24, 11:24, 15:13, 19:8, 19:11, 20:23, 21:4, 21:19, 29:22, 32:3, 34:9, 36:21, 45:7, 45:10, 51:16, 55:3
otherwise
7:24, 11:17
out
19:9, 30:19, 30:25, 31:18, 54:17
outcome
62:18
outside
21:2
over
25:20, 42:16, 57:23
overall
48:15
overcome
11:6
overlap
7:15, 15:14
oversimplifies
33:25
overview
50:19
own
21:6
owner
1:14, 2:14, 2:20, 3:12, 6:17, 52:19
owner's
43:4

P

pacific
2:21
page
4:7, 5:2, 5:6, 5:11, 8:10, 9:18, 10:3, 14:10, 31:10, 41:23, 49:23, 50:21, 50:22, 56:2, 56:4, 56:11
pages
1:34, 40:10, 56:14
paper
7:13, 10:4, 52:17, 52:19
paragraph
10:2, 10:15, 10:16, 11:2, 16:22, 18:6, 19:2, 19:14, 23:20, 23:25, 31:9, 31:11, 32:20, 32:22, 32:25, 33:6, 34:24, 35:6, 35:14, 35:16, 36:2, 40:14, 41:10, 42:7, 43:1, 45:21, 46:5, 47:6, 47:25, 48:17, 48:24, 49:22, 50:21, 50:23, 51:5, 52:6, 52:8, 52:20, 53:22, 54:13, 57:1, 57:4, 57:8, 57:17, 58:12, 58:17, 59:1, 59:3, 60:15, 60:25, 61:2, 61:4, 61:6
paragraphs
34:3, 46:15, 51:2, 51:16, 51:20
parallel
37:8
part
9:7, 12:20, 13:2, 13:14, 24:20, 26:24, 29:16, 29:18, 30:15, 31:1, 31:5, 31:24, 33:11, 38:1, 51:12, 53:14, 54:3, 61:3
particular
9:24, 17:18, 18:7, 18:22, 19:11, 20:10, 23:11, 44:15, 44:24, 45:8, 45:18, 49:18, 51:17, 55:1
particularly
15:9, 28:8, 33:7
parties
53:3
parts
30:25, 31:1, 31:4
party
62:17, 62:19
passages
11:18
patent
1:1, 1:2, 1:14, 2:1, 2:2, 2:14, 2:20, 3:12, 6:17, 7:21, 8:15, 8:18, 8:25, 9:4, 10:22, 11:2, 13:13, 13:22, 13:25, 15:9, 15:15, 15:18, 16:24, 17:4, 17:9, 17:16, 17:19, 18:10, 18:14, 19:10, 27:17, 28:6, 28:13, 28:16, 28:25, 29:8, 29:10, 30:10, 30:14, 43:4, 52:18
patents
11:3, 11:13, 15:1, 15:13,

16:2, 16:5, 16:18, 17:16, 18:2, 19:9, 19:12, 28:10, 38:6, 38:11, 55:7, 59:25
pc 24:2
pdf 10:3, 31:9, 49:23
pending 60:5
people 29:23
peripheral 16:25, 17:4, 17:5, 17:9, 17:12, 20:13, 20:14, 49:4, 49:12, 57:21
peripherals 17:11, 49:9
permanently 24:1, 36:17
person 20:4, 20:11, 20:22, 21:5, 21:8, 25:13, 27:5, 29:17, 30:8, 30:16, 32:7, 33:16, 34:6, 34:11, 35:9, 37:12, 37:22, 37:25, 43:15, 43:20, 44:4, 44:11, 46:20, 46:23, 48:13, 48:22, 55:1, 55:6, 59:19, 59:24, 60:2
perspective 59:19
pertinent 18:7
petition 52:7, 52:11, 52:13, 52:15, 52:17, 55:21, 59:14
petitioner 3:3, 6:19, 59:10, 59:15
petitioner's 7:25
petitioners 1:8, 2:8
petitions 53:6
ph 1:20, 2:19, 4:4, 6:14, 6:23
physically 58:13
place 6:9, 27:15, 50:24, 51:20
places 30:12
planet 6:13
platform 17:23
please 6:15, 6:20, 57:2, 60:12, 60:15
plethora 18:15
plug-and-play 15:20
plugging 15:21
plurality 51:9
point 26:5, 29:14, 30:4, 30:11, 36:18, 38:18, 39:3, 40:11, 47:25, 48:18, 51:22, 52:12, 53:13
por 52:19, 55:21
portable 15:21
portfolio 13:13, 13:17, 13:22
portions 17:10, 50:11, 52:4
position 36:25, 57:9
positions 25:5, 45:20
potentially 23:14, 56:24
practice 11:12
practices 14:17, 14:19
pre-grant 27:24
pre-install 37:21
predictable 19:19, 19:22, 20:6, 20:7, 23:9
preference 8:4
preinstalled 24:23, 27:4, 32:6, 33:15, 37:10, 46:25, 47:1, 48:20
preparation 9:7, 12:20
prepare 9:19
preparing 13:14
present 13:1, 33:9
preserve 38:1
pretty 22:15, 23:13, 35:3, 35:11
prevents 58:23
previously 29:21, 46:14
primarily 39:15
primary 44:16, 45:8
prior 18:4, 23:16, 25:25, 26:4, 27:16, 27:23, 28:16, 30:20, 43:4, 47:12, 50:19, 54:25, 55:8, 62:9
priority 22:19, 30:9, 55:6
probably 15:23, 16:10, 20:1, 20:23, 21:19, 42:14, 50:11, 50:24, 60:14
problem 17:18, 18:7, 18:9, 18:11, 18:22, 19:11
problems 18:16
proceeding 7:20
proceedings 7:14, 8:2, 8:12, 11:10, 15:2, 16:3, 43:9, 55:14, 61:17, 62:10, 62:13, 62:17
process 28:9, 28:24
product 25:15, 36:6, 38:13, 38:24
products 11:13, 12:19, 12:24, 12:25, 25:24, 27:9, 36:23
projection 58:25

projector
58:2, 58:8, 58:19
prominently
17:11, 39:7
promise
46:3
proposed
59:13
pros
20:24
prosecution
28:21
protocol
20:8
protocols
21:4
provide
21:14, 34:10, 48:5, 49:8, 49:9
provided
17:25, 53:18
provides
57:18
providing
41:1, 49:14, 56:23
publication
22:17, 27:24, 29:8
pull
32:16, 55:16
purpose
35:24, 47:4, 50:1, 50:4, 50:8, 50:12, 50:16, 51:1, 51:3, 51:15, 51:21, 51:24
purposes
15:3, 44:7
pursuant
2:24
purview
21:5
push
30:1
puts
28:12

Q

question
17:20, 27:21, 28:2, 38:9, 45:3, 52:5, 55:18, 57:8, 57:14, 60:8, 60:21, 61:3
questions
5:9, 7:9, 23:7, 61:13
quick
13:25, 14:4, 42:17, 60:8
quote
16:24, 19:18, 27:12, 29:7

R

raise
6:20
range
23:15
read
9:13, 43:16, 43:17, 43:21, 53:7, 53:10, 60:15
reading
46:20
really
24:16, 24:25, 34:1, 34:3, 37:15, 45:16
reason
8:7, 8:9, 9:22, 9:24, 25:11, 26:6, 30:22, 37:19, 39:5
reasonable
59:12, 59:16
reasonably
18:6
reasoning
37:7
reasons
37:12, 44:11, 45:10, 45:14, 45:18, 48:23, 55:3
recall
11:14, 13:11, 13:12, 13:17, 14:20, 16:4, 16:6, 19:13, 22:20, 23:18, 31:3, 40:3, 60:21
recalled
15:10
receives
51:8
recent
41:12
recess
42:20
recollection
13:4, 23:18, 42:1, 53:20, 58:2
record
6:5, 36:11, 36:16, 42:21, 60:16, 61:15
red
40:19, 42:8
refer
8:2
reference
16:10, 21:9, 24:22, 26:7, 26:22, 27:13, 27:16, 27:23, 28:4, 30:8, 30:20, 30:21, 31:4, 32:9, 35:10, 43:11, 43:13, 43:16, 43:18, 43:19, 43:21, 44:1, 44:3, 44:5, 44:7, 44:16, 44:18, 44:25, 45:8, 45:10, 46:13, 46:20, 50:9, 50:13, 51:24, 51:25, 52:2, 56:10, 60:12
reference's
51:24
referenced
16:10, 53:2, 58:6
references
11:23, 24:19, 24:20, 25:2, 25:9, 25:11, 25:12, 25:14, 25:16, 25:17, 26:6, 26:10, 26:11, 27:2, 27:6, 27:11, 34:16, 37:3, 37:14, 37:17, 39:17, 39:19, 44:1, 44:8, 44:13, 45:11, 45:13, 45:18, 45:19, 49:11, 49:14, 49:17, 54:10, 55:3, 59:23
referring
9:16, 18:8, 18:22, 43:12, 49:19, 58:11
reflected
40:13
reflective
53:19, 53:20
refresh
53:15
regardless
30:4, 36:23
regards
11:1
rejection
28:17, 28:19
related
14:1, 14:2, 17:14, 62:16
relates
11:4, 37:20,

48:15
relating
13:23
relation
38:7, 38:12
relative
59:24
relevance
16:9
relevant
13:7, 15:9, 15:17, 16:8, 20:2, 20:9, 22:18, 25:15, 25:18, 27:25, 50:12, 51:18, 52:5, 53:24, 54:2, 54:15, 54:16, 54:18, 61:3, 61:6
reliance
27:8
relied
25:2
rely
44:6, 48:7
relying
27:3, 48:4
remember
13:25, 41:11
remotely
6:9
repeat
57:14
reply
7:17, 8:11, 10:1, 10:15, 11:2, 12:16, 12:21, 13:3, 13:14, 13:21, 14:14, 16:13, 16:14, 16:21, 19:15, 23:20, 31:7, 39:6, 42:24, 45:21, 48:24, 49:20, 52:6, 53:22, 54:13, 57:1, 59:6
reported
1:29
reporter
2:24, 6:12, 6:25, 7:12, 62:1, 62:8
reporters
62:21
represent
9:21
representing
6:12, 6:18
require
24:20, 32:5, 32:14, 38:3
required
24:3, 24:13, 35:21, 47:21, 59:16, 60:22
requirement
31:14, 32:2, 32:3, 33:23, 37:21, 45:5, 46:7, 46:22, 47:8, 47:13, 47:19, 48:1, 48:12
requirements
24:25
requires
40:5
requisite
13:5
respect
10:22, 25:3, 25:6, 25:25, 26:3, 31:22, 32:2, 40:24, 48:11, 54:25
respective
49:4, 49:12
respectively
6:8
respond
11:17
responded
45:20
responding
12:16
response
28:18, 39:21, 47:14
responses
53:6
review
12:19, 13:13, 52:11
reviewed
9:6, 11:9, 28:21, 52:12, 52:14
reviewing
33:17
right
6:21, 8:15, 8:18, 8:25, 9:4, 11:18, 12:4, 14:11, 14:24, 23:1, 23:23, 28:14, 28:19, 28:22, 29:2, 29:10, 30:5, 30:6, 32:19, 32:23, 35:17, 35:22, 35:23, 41:11, 41:14, 41:18, 43:9, 44:20, 49:21, 55:24, 56:3, 56:8, 56:15, 56:20, 56:23, 57:5, 58:5, 58:9, 58:14, 58:19, 58:20, 60:7
ring
22:5, 53:12
rise
11:20
round
40:3
rpr
1:31, 2:23, 62:7, 62:27
rules
7:8

S

sacramento
62:5
said
18:24, 29:13, 29:20, 30:11, 30:12, 31:3, 31:4, 31:21, 35:20, 36:10, 38:2, 40:11, 47:15, 59:3, 62:13, 62:17
same
7:8, 7:15, 7:21, 8:1, 8:10, 10:24, 14:9, 15:3, 19:10, 19:14, 42:7, 47:8, 47:11, 47:15, 47:25, 52:19
san
3:18
savvy
33:8
say
9:16, 16:12, 16:23, 19:24, 23:25, 31:12, 33:21, 33:23, 46:8, 49:15, 51:20
saying
26:25, 44:23, 45:1
says
15:17, 18:6, 18:14, 31:21, 31:23, 33:1, 40:5, 42:13, 43:3, 47:5, 50:22, 53:23, 57:8, 57:17
scalability
18:25, 19:7
scope
17:15, 31:19,

53:4
screen
13:1, 24:9, 51:11, 58:9
screenshot
41:13, 42:7
screenshots
12:23, 23:23, 35:25
se
54:7
search
21:21, 46:16, 52:25
searching
14:5, 14:6, 28:17
second
24:9, 31:8, 52:8, 56:4
secondary
10:9, 10:18, 10:21, 11:4, 11:6, 11:21, 11:25, 12:10, 44:17, 44:25, 45:9, 55:8
section
10:8, 10:17, 11:12, 12:15, 12:18, 15:11, 15:13, 15:23, 16:22, 18:23, 18:24, 19:1, 50:19, 54:7
sections
15:18
security
17:22
see
10:10, 10:19, 10:20, 12:24, 13:23, 14:7, 15:14, 17:1, 19:15, 19:16, 19:20, 22:17, 24:4, 24:11, 30:21, 31:15, 31:16, 32:16, 35:5, 40:20, 40:21, 41:22, 42:9, 42:10, 43:6, 45:24, 46:4, 49:5, 50:2, 50:14, 50:17, 51:3, 52:9, 52:10, 52:20, 53:1, 53:13, 53:16, 53:25, 55:23, 56:4, 56:5, 56:11, 56:13, 56:21, 57:10, 57:11, 60:19
seek
37:23, 44:1
seem
23:1, 29:19
seemed
15:8
seeming
28:3
seems
9:22, 25:5, 25:10, 34:14, 38:18
seen
29:4, 29:5, 36:11, 36:15
sends
57:22
sense
30:2
sentence
10:24, 17:1, 31:23, 43:1, 43:12, 46:13, 47:8, 47:9, 49:2, 49:3, 49:25
set
22:15, 35:12, 37:13, 45:14, 48:23, 53:18, 58:4, 58:8, 60:1
setup
61:9, 61:12
seven
46:1
several
24:1
shannon
1:30, 2:23, 6:11, 62:7, 62:27
share
13:1
shorthand
2:24, 6:12, 6:24, 62:1, 62:8, 62:14
should
7:15, 44:8, 49:16, 51:13, 55:15, 57:19, 57:20, 57:23, 58:10, 59:15
shouldn't
39:8
show
36:5
shows
38:15, 38:17
signature-5tm1q
62:25
signed
42:4
significantly
28:8
similar
10:16, 15:12, 16:24
simply
17:8
since
14:6, 60:13
sit
13:20, 40:7, 45:15
sitting
41:11, 55:12
situations
45:7
six
45:25, 46:3
skill
20:4, 20:11, 20:22, 21:5, 21:9, 25:13, 27:5, 29:17, 30:8, 30:16, 32:8, 33:16, 34:7, 34:11, 35:9, 37:12, 37:22, 37:25, 43:14, 43:15, 43:20, 44:4, 44:12, 46:20, 46:23, 48:13, 48:22, 55:2, 55:6, 59:20, 59:24, 60:2, 60:3
software
26:23, 27:1, 27:3, 33:2, 33:5, 33:14, 34:6, 34:8, 35:14, 36:21, 37:21, 38:3, 38:4, 38:7, 38:12, 38:24, 38:25, 39:14, 40:13, 41:17, 46:22, 47:1, 47:2, 48:20, 49:8, 60:23, 61:8, 61:11
solely
43:5
solution
21:6, 25:8, 26:25, 48:21
solutions
17:24, 19:19, 19:22, 19:25, 20:6, 20:7, 23:9, 34:9
solve
18:2
solved
18:17
some
12:23, 15:13,

15:17, 16:5, 20:23, 23:23, 26:1, 27:9, 28:16, 32:5, 32:14, 33:2, 33:4, 33:13, 34:18, 36:16, 37:6, 38:3, 38:15, 38:25, 40:15, 41:24, 44:11, 47:3, 47:4, 48:8, 48:10, 48:12, 53:13, 55:21, 56:10
somebody 28:12
something 14:21, 20:21, 30:14, 30:16, 36:19, 40:4, 40:5, 45:4, 46:22, 54:20, 61:4
somewhere 12:6, 50:15, 51:4
sorry 24:7, 25:19, 26:15, 27:21, 32:21, 41:8, 46:2, 59:3
sort 13:8, 32:5, 32:14, 37:19, 44:2, 45:16
sound 22:3
sounds 22:8, 29:25, 30:1, 42:18
speak 52:25
speaking 56:18
speaks 54:23
spec 23:17
specific 12:18, 13:18, 14:1, 14:7, 44:2, 45:14, 50:10, 51:19, 56:20
specifically 9:12, 11:19, 13:11, 13:12, 18:2, 19:13, 22:20, 34:12, 40:5, 47:5, 49:17, 51:17, 54:24
specification 18:10, 18:14, 28:12
specificity 12:9
specs 23:4, 23:6
specter 39:21
ss 62:4
st 3:7
stack 22:24
standard 17:13, 20:19, 21:13, 22:16, 23:13
start 25:20, 40:18
started 61:5
starting 51:21
starts 15:15, 49:23, 50:20
startup 36:14
state 10:8, 18:1, 18:3, 55:5, 62:3
stated 28:4
statement 10:18
statements 17:21
states 1:1, 2:1
stenographer 6:4, 6:20, 42:21, 61:15
stenographically 1:29
step 47:2, 61:8
still 8:21, 23:9, 24:10, 31:7, 36:22, 49:20
stipulation 62:20
stood 19:9
stop 57:22, 57:23, 58:21, 58:22
stopped 57:13, 57:16
stops 57:9, 57:18, 58:18
storage 21:18
store 40:24
stretch 42:17
strike 10:25
strive 7:20
strong 35:12
subclass 56:12
subclasses 22:6, 22:9, 56:10, 56:15
subheading 19:15
subheadings 19:6
submitted 42:3
subscribed 62:22
success 59:13, 59:17
sufficient 60:3
suggest 11:22, 39:18
suggested 11:23
suggesting 26:5, 36:20, 37:16
suite 3:17
sum 54:22
summarize 18:20
summary 50:23
supervision 62:15
supplied 5:5
support 16:15, 35:2
supported 25:12
supposed 29:14
supreme 53:8
sure 11:16, 12:14, 14:5, 23:22, 26:22, 31:20, 36:4, 40:7, 45:12
suspect 32:18
swapping 15:21
switch 57:9, 58:11,

58:17, 58:20
sworn
6:21, 6:22, 6:24, 62:10
system
31:15, 32:3, 46:7, 46:23, 47:19, 58:4, 58:8

T

table
56:2
take
21:9, 42:17
taken
2:20, 25:5, 36:25, 39:15, 42:20, 62:13
takes
31:18
taking
6:9
talk
9:11, 51:16
talked
46:15, 47:16
talking
7:19, 9:2, 12:3, 16:23, 35:14, 38:20, 40:9, 43:2, 46:6, 52:7, 57:4, 58:13, 59:4
talks
19:18, 35:7, 50:1
task
13:18
teaching
44:20, 45:1, 45:4, 45:6
teachings
43:22
technical
15:11, 15:25, 18:12, 20:10, 59:19, 59:25
technolog
33:7
technologies
15:17
technology
1:4, 1:6, 2:4, 2:6, 6:6, 16:18, 23:15, 33:8, 53:24, 54:16
tell
41:4
ten
20:12, 20:15, 21:2
term
25:25, 26:4, 34:19, 38:6, 38:11, 38:14, 38:22, 39:1, 39:9, 39:10, 39:11, 39:15, 39:16, 39:17, 39:18
terminal
51:9
terminology
17:7
terms
15:24, 20:3, 26:24, 34:12, 53:4, 54:23, 60:2
testified
6:25
testify
62:11
testimony
8:8
testing
13:8, 42:2
th
41:25, 42:4
thank
42:19
thanks
7:24, 60:19
themselves
16:6, 59:25
thereafter
62:14
thereof
62:18
thing
7:15, 13:23, 37:20, 44:22, 47:11, 47:15
things
15:20, 29:22, 33:16, 36:20, 37:10, 38:21, 39:7, 55:4, 55:12
think
9:12, 9:14, 11:5, 11:19, 11:25, 12:3, 12:9, 12:11, 12:23, 13:6, 15:5, 15:10, 15:11, 16:8, 16:16, 16:22, 17:5, 17:14, 17:23, 18:20, 20:4, 20:5, 20:8, 20:10, 20:16, 20:17, 20:22, 21:7, 21:17, 21:18, 22:15, 22:21, 23:12, 24:16, 25:12, 30:7, 33:25, 35:3, 35:8, 35:11, 35:16, 35:23, 36:6, 36:13, 37:18, 39:1, 39:8, 39:14, 39:15, 39:20, 39:22, 40:2, 43:2, 43:12, 43:20, 46:15, 46:19, 47:10, 51:7, 52:3, 52:12, 52:18, 53:3, 54:8, 54:22, 57:20, 59:25, 61:3
thinks
28:5
third
37:19, 56:11
thought
16:7, 22:19, 30:6, 33:19, 55:21
three
19:8, 19:11, 20:1, 21:11
through
9:13, 14:5, 15:23, 19:25, 20:13, 21:21, 24:5, 27:1, 34:20, 47:1, 50:23, 51:2, 53:1
throughout
21:16
tiers
20:17
time
2:21, 23:19, 29:14, 30:4, 30:11, 33:2
times
7:8, 29:4, 29:6, 52:22
today
7:14, 9:3, 9:7, 13:20, 17:17, 19:3, 40:7, 60:6, 60:21
today's
6:9
together
28:12, 58:2
tool
47:23
tools
27:9
top
49:23
total
54:22

towards
52:8
trademark
1:1, 2:1
transcribed
62:14
transcript
7:14, 14:10, 32:22
transfer
21:1, 57:9, 57:13, 57:15, 58:23
transferred
51:9
transmission
58:18
transmitted
57:23
transmitting
57:22
trial
1:2, 2:2
tried
20:9, 39:14
truth
62:11, 62:12
truthful
8:7
try
21:21, 27:22, 36:4
trying
26:4, 29:23, 34:20, 38:1, 44:17, 45:9, 51:12, 52:1, 54:17
two
9:22, 9:23, 21:16, 25:16, 26:9, 26:12, 26:21, 37:14, 44:8, 44:12, 45:11
type
20:18
types
20:25
typewriting
62:14
typos
9:13

U

uchida
57:4, 57:7, 59:4
ultimately
25:3, 28:24, 46:24, 48:22, 58:1
uncertainty
48:11
unclear
18:1, 27:21
unclearly
39:10
under
19:6, 25:1, 62:15
undercut
27:6, 34:16
undermined
44:16, 44:25, 45:9
understand
28:2, 30:13, 34:7, 35:9, 35:10, 37:25, 43:10, 43:21, 43:23, 44:3, 45:5, 46:21, 48:10, 48:14, 52:2, 58:16
understanding
20:24, 23:8, 24:7, 25:13, 32:10, 52:4, 53:18, 53:24, 54:2, 54:9, 54:15, 54:16, 54:18, 54:24, 59:8, 59:11
understood
13:19, 23:14, 29:18, 30:3
undertaken
15:4
undertaking
13:18
undertook
43:8
undue
59:21, 60:4
unique
20:15
united
1:1, 2:1
unpatentability
14:23
unquote
29:7
until
15:16, 30:6
uploaded
33:3
usa
1:4, 2:4, 6:6
usb
16:24, 17:4, 17:5, 17:9, 17:10, 17:12, 17:13, 17:14, 19:3, 19:25, 20:1, 20:2, 20:6, 20:8, 20:15, 20:18, 20:19, 20:25, 21:1, 21:3, 21:12, 21:13, 21:23, 22:7, 22:13, 22:15, 22:24, 23:13, 56:2, 56:5, 56:23
use
8:1, 12:19, 12:25, 13:10, 17:22, 18:25, 19:3, 19:6, 20:3, 27:4, 31:13, 31:17, 32:6, 32:12, 33:6, 33:12, 34:1, 34:5, 34:10, 38:6, 38:11, 39:16, 46:10, 46:25, 47:5, 47:24, 48:16, 48:17, 48:19, 58:7
useful
35:8
users
33:7
uses
21:3, 21:24, 24:23, 26:3, 34:19
using
16:24, 20:24, 21:4, 26:23, 33:4, 39:18
usually
46:17

V

vague
54:5
valid
34:18, 37:5
variety
59:22
various
35:7, 49:9
vendor
56:20, 56:23
version
32:16, 41:6, 41:9, 43:24
versus
6:7, 25:7
via
1:21, 2:22, 6:1, 6:9
video
33:9
video's
24:10
videoconference
1:21, 2:22, 6:1
vs
1:10, 2:10

W

waive
62:20
want
11:16, 12:14, 23:7, 26:19, 49:25
wanted
22:25, 32:7
washington
3:8
way
20:17, 25:7, 25:22, 26:23, 34:21, 56:19, 62:17
ways
20:5, 20:12, 25:19, 43:25, 46:18, 48:16, 48:18, 56:17
we'll
9:2
we're
7:13, 8:10, 14:9, 32:21, 40:9, 57:4
we've
7:7, 34:2, 42:16
website
22:14
wednesday
62:24
well-known
19:3
went
41:7
whatever
56:22, 57:25
whereof
62:22
whereupon
6:22, 42:20, 61:17
whether
25:16, 33:13, 35:25, 36:1, 36:23, 38:22, 39:12, 40:8, 46:10, 47:17, 47:18, 48:11, 54:25, 55:1, 60:2, 60:22
whole
15:23, 22:2, 25:10, 33:12, 37:2, 37:16, 37:20, 50:23, 60:1, 62:11
widely
33:8
wireless
51:10, 57:24
within
17:5, 17:15, 20:2, 20:6, 20:10, 21:5, 22:6, 23:13, 42:5, 48:6
without
59:21, 60:4, 61:10
witness
4:3, 6:19, 6:22, 7:1, 42:18, 54:6, 60:19, 62:9, 62:22
wondering
38:22
word
31:13, 31:18, 32:13, 45:22, 46:11, 46:16, 47:17, 47:18
words
32:4
work
7:22, 8:5, 13:2, 13:14, 53:14
works
25:8, 58:7
wouldn't
25:11, 26:5, 27:5, 30:22, 30:23, 34:15, 37:3, 37:9, 37:17, 39:18, 45:19, 49:15
wrong
9:15, 37:18, 39:3

Y

yang
6:18
yeah
13:12, 46:4, 49:25
yealink
1:4, 1:5, 2:4, 2:5, 6:6, 6:19
yep
35:18
yourself
60:17
yourselves
6:15

Z

zero
25:4, 25:19, 25:21, 26:2, 36:7, 36:20, 36:22, 37:1, 37:5, 37:14, 38:6, 38:11, 38:20, 39:2, 39:13, 39:21, 39:25, 40:12
zoom
6:10

.

.7500
3:9
.8238
3:19

0

002
8:15, 10:12, 10:15, 10:22, 13:24, 31:6, 31:7, 42:23, 45:21, 48:24
01
2:21, 6:2, 6:5
01436
1:11, 2:11, 6:8, 8:14
01437
1:12, 2:12, 6:8, 8:24
01438
1:13, 2:13, 6:8, 9:3
01439
1:14, 2:14, 6:8, 8:17
03
22:3

1

1
1:34, 58:14
10
23:20, 23:25, 35:14, 35:16, 40:14, 41:10, 41:13, 41:23, 42:7, 49:23, 53:22, 54:13, 61:16
1002
50:19
1009
57:5
1027
32:18, 60:12
1083
7:18
1090
13:24, 14:6, 14:9, 14:13
11
41:25
12
15:19
1200
3:17

13
48:24
14
15:23
15
41:23, 42:4
184
50:22
1900
3:7
1st
6:5

2

2000
23:19
20006
3:8
2010
23:19
202.496
3:9
2024
1:11, 1:12, 1:13, 1:14, 2:11, 2:12, 2:13, 2:14, 6:8, 8:14, 8:17, 8:24, 9:3, 41:25, 55:16, 55:24
2025
1:22, 2:22, 6:1, 6:6, 62:24
21
10:15, 18:13
22
15:16, 32:20, 32:22, 32:25, 46:15, 47:6, 48:17, 57:1, 57:4, 57:8
23
33:6, 46:16
237
8:25, 9:14, 15:9, 15:11, 15:15, 15:18, 16:8, 16:11, 16:12, 16:21, 16:24, 17:4, 17:9, 17:16, 17:19, 18:10, 18:13, 19:10, 19:14, 23:20, 35:13
24
59:1, 59:3, 59:4, 59:5
25
23:1, 56:8
27
10:3
2c
58:3

3

3
58:19
3.0
22:16, 22:19, 23:17
37
10:2, 11:2

4

40
60:15
415.882
3:19
47
50:21
48
50:22

5

57
61:16

6

60
4:9
610994
1:33
62
1:34
65
34:24, 35:6
676
9:3

7

70
50:21, 50:23, 51:5
71
57:17, 58:17
72
50:24

9

9
2:21, 6:2, 6:5
94111
3:18
9436
1:31, 2:24, 6:13, 62:7, 62:28
951
8:17, 10:1, 10:7, 11:2, 49:20, 50:18, 52:6, 53:22, 54:6, 54:13, 55:17, 55:19, 57:1, 59:5, 59:6